

Exhibit B

Monthly Statements

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

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IN RE:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3566-LTS

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO,

Debtor.

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**COVER SHEET TO THIRTY-NINTH MONTHLY FEE APPLICATION OF PROSKAUER
ROSE LLP AS ATTORNEYS TO THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, AS REPRESENTATIVE OF DEBTOR, EMPLOYEES
RETIREMENT SYSTEM (“ERS”)
FOR THE PERIOD JUNE 1, 2020 THROUGH JUNE 30, 2020**

Name of Applicant:

Proskauer Rose LLP (“Proskauer”)

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Authorized to Provide
Professional Services to:

Financial Oversight and Management Board, as
Representative for the Debtor Pursuant to
PROMESA Section 315(b)

Period for which compensation
and reimbursement for fees and services
is sought:

June 1, 2020 through June 30, 2020

Amount of compensation sought
as actual, reasonable and necessary:

\$1,111,473.00

Amount of expense reimbursement sought
as actual, reasonable and necessary:

\$45,639.05

Total Amount for these Invoices:

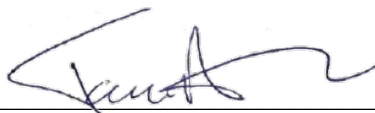
\$1,157,112.05

This is a: X monthly ___ interim ___ final application.

This is Proskauer's thirty-ninth monthly fee application in these cases.

Principal Certification

I hereby authorize the submission of this Monthly Fee Statement for June 2020.

A handwritten signature in dark ink, appearing to read 'Jaime A. El Koury', is positioned above a horizontal line.

Jaime A. El Koury
General Counsel to the Financial Oversight and
Management Board for Puerto Rico

On July 23, 2020 sent to:

FOMB:

Financial Oversight and Management Board
40 Washington Square South
Office 314A
New York, NY 10012
Attn: Professor Arthur J. Gonzalez
FOMB Board Member

O'Neill & Borges LLC
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Office of United States Trustee

Office of the United States Trustee for the District of
Puerto Rico
Edificio Ochoa, 500 Tanca Street, Suite 301
San Juan, PR 00901
(In re: Commonwealth of Puerto Rico)

Office of the United States Trustee for Region 21
75 Spring Street, SW, Room 362
Atlanta, GA 30303
Attn: Guy G. Gebhardt
Acting United States Trustee (Region 21)
(In re: Commonwealth of Puerto Rico)

**Co-Counsel for the Official Committee of Unsecured
Creditors:**

Paul Hastings LLP
200 Park Avenue
New York, NY 10166
Attn: Luc. A. Despins, Esq.

Casillas, Santiago & Torres, LLC
El Caribe Office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901-2419
Attn: Juan J. Casillas Ayala, Esq.
Alberto J. E. Añeses Negrón, Esq.

Co-Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, WI 53703
Attn: Katherine Stadler

EDGE Legal Strategies, PSC
252 Ponce de León Avenue
Citibank Tower, 12th Floor
San Juan, PR 00918
Attn: Eyck O. Lugo

Co-Counsel for AAFAF:

O'Melveny & Myers LLP,
Times Square Tower
7 Times Square
New York, NY 10036
Attn: John J. Rapisardi, Esq.
Suzanne Uhland, Esq.
Diana M. Perez, Esq.

Marini Pietrantonio Muñiz LLC
MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero, Esq.

Co-Counsel for the Official Committee of Retirees:

Jenner & Block LLP
919 Third Avenue
New York, NY 10022-3908
Attn.: Robert Gordon, Esq.
Richard Levin, Esq.

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn.: Catherine Steege, Esq.
Melissa Root, Esq.

Bennazar, García & Milián, C.S.P.
Edificio Union Plaza, PH-A
416 Avenida Ponce de León
Hato Rey, PR 00918
Attn.: A.J. Bennazar-Zequeira, Esq.

Puerto Rico Department of Treasury

PO Box 9024140
San Juan, PR 00902-4140
Attn: Reylam Guerra Goderich, Deputy Assistant of
Central Accounting
Omar E. Rodríguez Pérez, CPA, Assistant
Secretary of Central Accounting
Angel L. Pantoja Rodríguez, Deputy Assistant of
Internal Revenue and Tax Policy
Francisco Parés Alicea, Assistant Secretary of
Internal Revenue and Tax Policy
Francisco Peña Montañez, CPA, Assistant
Secretary of the Treasury

Summary of Legal Fees for the Period June 2020

ERS – General			
Task Code	Matter Description	Total Billed Hours	Total Fees Requested
202	Legal Research	63.50	\$50,101.50
206	Documents Filed on Behalf of the Board	226.60	\$178,787.40
207	Non-Board Court Filings	18.40	\$14,517.60
210	Analysis and Strategy	1,043.60	\$823,400.40
212	General Administration	152.70	\$41,229.00
215	Plan of Adjustment and Disclosure Statement	0.90	\$710.10
218	Employment and Fee Applications	10.10	\$2,727.00
Total		1,515.80	\$1,111,473.00

Summary of Legal Fees for the Period June 2020

ACROSS ALL ERS-RELATED MATTERS

Professional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Brian S. Rosen	Partner	BSGR & B	\$789.00	11.10	\$8,757.90
Carlos E. Martinez	Partner	Corporate	\$789.00	2.60	\$2,051.40
Chantel L. Febus	Partner	Litigation	\$789.00	21.30	\$16,805.70
Ehud Barak	Partner	BSGR & B	\$789.00	50.20	\$39,607.80
Jeffrey W. Levitan	Partner	BSGR & B	\$789.00	145.30	\$114,641.70
Jonathan E. Richman	Partner	Litigation	\$789.00	6.20	\$4,891.80
Kevin J. Perra	Partner	Litigation	\$789.00	0.50	\$394.50
Lary Alan Rappaport	Partner	Litigation	\$789.00	0.20	\$157.80
Margaret A. Dale	Partner	Litigation	\$789.00	113.80	\$89,788.20
Mark Harris	Partner	Litigation	\$789.00	1.60	\$1,262.40
Michael A. Firestein	Partner	Litigation	\$789.00	0.50	\$394.50
Michael R. Hackett	Partner	Litigation	\$789.00	6.80	\$5,365.20
Paul Possinger	Partner	BSGR & B	\$789.00	1.80	\$1,420.20
Steven O. Weise	Partner	Corporate	\$789.00	141.10	\$111,327.90
Timothy W. Mungovan	Partner	Litigation	\$789.00	0.50	\$394.50
Jennifer L. Roche	Senior Counsel	Litigation	\$789.00	94.70	\$74,718.30
Adam L. Deming	Associate	Litigation	\$789.00	41.70	\$32,901.30
Brooke C. Gottlieb	Associate	Litigation	\$789.00	2.90	\$2,288.10
Brooke H. Blackwell	Associate	Corporate	\$789.00	4.20	\$3,313.80
Carl Mazurek	Associate	Litigation	\$789.00	61.30	\$48,365.70
Elisa Carino	Associate	Litigation	\$789.00	54.20	\$42,763.80
Elliot Stevens	Associate	BSGR & B	\$789.00	5.60	\$4,418.40
Hena Vora	Associate	Litigation	\$789.00	13.20	\$10,414.80
Joshua A. Esses	Associate	BSGR & B	\$789.00	35.40	\$27,930.60
Kelly M. Curtis	Associate	Litigation	\$789.00	26.00	\$20,514.00
Laura Stafford	Associate	Litigation	\$789.00	5.20	\$4,102.80

Summary of Legal Fees for the Period June 2020

Professional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Matthew A. Skrzynski	Associate	BSGR & B	\$789.00	25.20	\$19,882.80
Mee R. Kim	Associate	Litigation	\$789.00	233.40	\$184,152.60
Megan R. Volin	Associate	Corporate	\$789.00	41.20	\$32,506.80
Russell T. Gorkin	Associate	Litigation	\$789.00	13.70	\$10,809.30
William D. Dalsen	Associate	Litigation	\$789.00	191.60	\$151,172.40
TOTAL				1,353.00	\$1,067,517.00

Paraprofessional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Dennis T. Mcpeck	Legal Assistant	Litigation	\$270.00	5.00	\$1,350.00
Eric R. Chernus	Practice Support	Professional Resources	\$270.00	5.50	\$1,485.00
Karina Pantoja	Legal Assistant	Labor & Employment	\$270.00	11.00	\$2,970.00
Lawrence T. Silvestro	Legal Assistant	Litigation	\$270.00	43.70	\$11,799.00
Natasha Petrov	Legal Assistant	BSGR & B	\$270.00	9.90	\$2,673.00
Olaide M. Adejobi	Legal Assistant	Litigation	\$270.00	4.50	\$1,215.00
Shealeen E. Schaefer	Legal Assistant	Labor & Employment	\$270.00	78.70	\$21,249.00
Tal J. Singer	Legal Assistant	Litigation	\$270.00	4.50	\$1,215.00
TOTAL				162.80	\$43,956.00

SUMMARY OF LEGAL FEES	Hours 1,515.80	Fees \$1,111,473.00
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Summary of Disbursements for the period June 2020

ACROSS ALL ERS-RELATED MATTERS

EXPENSE CATEGORY	AMOUNTS
Food Service/Conf. Dining	\$2,824.22
Lexis	\$4,982.00
Practice Support Vendors	\$6,068.50
Reproduction	\$74.70
Telephone	\$70.00
Westlaw	\$15,614.00
Filing And Court Costs	\$7,751.14
Transcripts & Depositions	\$8,254.49
Total	\$45,639.05

Proskauer requests payment of fees and reimbursement of expenses in accordance with the procedures set forth in the Interim Compensation Order (*i.e.*, payment of ninety percent (90%) of the compensation sought, in the amount of \$1,000,325.70 and reimbursement of one-hundred percent (100%) of expenses incurred, in the amount of \$45,639.05) in the total amount of \$1,045,964.75.

Professional Certification

I hereby certify that no public servant of the Department of Treasury is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the authorized representatives of the Financial Oversight and Management Board for Puerto Rico. The amount of this invoice is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, Proskauer Rose LLP does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900

Exhibit A

33260 FOMB

Invoice 190155022

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD
MEMBER

0007 PROMESA TITLE III: ERS

Page 1

Summary of Time Billed by Task		Hours	Value
202	Legal Research	63.50	\$50,101.50
206	Documents Filed on Behalf of the Board	226.60	\$178,787.40
207	Non-Board Court Filings	18.40	\$14,517.60
210	Analysis and Strategy	1,043.60	\$823,400.40
212	General Administration	152.70	\$41,229.00
215	Plan of Adjustment and Disclosure Statement	0.90	\$710.10
218	Employment and Fee Applications	10.10	\$2,727.00
Total		1,515.80	\$1,111,473.00

Legal Research -- 202

Date	Timekeeper	Task	Description	Hours	Amount
06/02/20	Elisa Carino	202	Conference with W. Dalsen regarding research issues in connection with third-party consultants.	0.20	\$157.80
06/03/20	Elisa Carino	202	Conduct legal research on privileged communications with third-party consultants to assist W. Dalsen.	2.90	\$2,288.10
06/14/20	Brooke C. Gottlieb	202	Research lawyers' ethical obligations upon receiving privileged documents in New York, Puerto Rico, California and Washington, D.C (2.90).	2.90	\$2,288.10
06/17/20	Michael A. Firestein	202	Research 12(c) adversary ruling issues (0.10).	0.10	\$78.90
06/19/20	Megan R. Volin	202	Research section 1111(b) in chapter 9 cases (0.40); E-mails with W. Dalsen regarding 1111(b) (0.20).	0.60	\$473.40
06/19/20	Elliot Stevens	202	E-mail with J. Levitan relating to interaction of section 927 and 1111(b) (0.10).	0.10	\$78.90
06/20/20	Elisa Carino	202	Conduct legal research on tort claims brought in breach of contract cases under Puerto Rican law.	2.90	\$2,288.10
06/21/20	Elisa Carino	202	Conduct legal research on 12(c) filing burdens to assist W. Dalsen (4.80); Draft summary regarding same (0.40).	5.20	\$4,102.80
06/23/20	Adam L. Deming	202	Review cases referenced in motion to dismiss Takings sections.	3.30	\$2,603.70
06/23/20	Hena Vora	202	Research regarding differences between advisory opinions and ripeness.	4.00	\$3,156.00
06/23/20	Joshua A. Esses	202	Research on 12(b) reply.	0.40	\$315.60
06/24/20	Adam L. Deming	202	Conduct research regarding property interests in bankruptcy jurisprudence.	2.20	\$1,735.80
06/24/20	Adam L. Deming	202	Conduct research regarding just compensation requirement in Takings cases.	1.70	\$1,341.30
06/24/20	Adam L. Deming	202	Conduct research regarding just compensation requirement in bankruptcy setting.	1.40	\$1,104.60
06/24/20	Adam L. Deming	202	Conduct research to distinguish claimants' cited cases for property interest section.	1.90	\$1,499.10
06/24/20	Matthew A. Skrzynski	202	Research and review background issues in support of drafting 12(c) response.	0.60	\$473.40
06/24/20	Hena Vora	202	Follow-up research regarding advisory opinions and ripeness as per W. Dalsen.	3.70	\$2,919.30
06/25/20	Adam L. Deming	202	Conduct research regarding regulatory taking analysis frameworks and when application of Penn Central factors is appropriate.	1.40	\$1,104.60

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Invoice 190155022

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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Date	Timekeeper	Task	Description	Hours	Amount
06/25/20	Adam L. Deming	202	Conduct research regarding how investment back expectations factor weighs toward dismissal.	1.60	\$1,262.40
06/25/20	Adam L. Deming	202	Conduct research regarding per se versus regulatory takings.	1.80	\$1,420.20
06/25/20	Adam L. Deming	202	Conduct research regarding how Penn Central economic loss factor counsels toward dismissal.	1.40	\$1,104.60
06/26/20	Adam L. Deming	202	Conduct research regarding character of government action Penn Central factor.	1.10	\$867.90
06/26/20	Adam L. Deming	202	Conduct research regarding public use Takings claims.	2.40	\$1,893.60
06/27/20	Elisa Carino	202	Conduct legal research on bankruptcy decisional authority denying motions for judgment on the pleadings to assist W. Dalsen.	4.80	\$3,787.20
06/28/20	William D. Dalsen	202	Review research from E. Carino regarding Rule 12(c) cases (0.20); Correspondence with J. Levitan regarding proposed insert pertaining to Rule 12(c) research (0.20).	0.40	\$315.60
06/28/20	Elisa Carino	202	Conduct legal research on bankruptcy decisional authority denying motions for judgment on the pleadings to assist W. Dalsen (2.70); Draft update regarding same (0.60).	3.30	\$2,603.70
06/29/20	Hena Vora	202	Research regarding the difference between advisory opinions and ripeness as per W. Dalsen.	1.00	\$789.00
06/30/20	Elisa Carino	202	Research First Circuit authority on integrated contracts (4.90); E-mail correspondence with M. Dale and team regarding same (0.20).	5.10	\$4,023.90
06/30/20	Hena Vora	202	Research regarding cases surrounding various case patterns related to 12(c) motions that were denied on advisory opinion or ripeness grounds.	4.50	\$3,550.50
06/30/20	Kelly M. Curtis	202	Review cases cited in Contracts Clause draft section of ERS reply.	0.60	\$473.40
Legal Research				63.50	\$50,101.50

Documents Filed on Behalf of the Board -- 206

Date	Timekeeper	Task	Description	Hours	Amount
06/01/20	Laura Stafford	206	E-mails with B. Blackwell, B. Rosen, and H. Bauer regarding PBA and ERS form deadlines (0.20).	0.20	\$157.80
06/03/20	Joshua A. Esses	206	Review outline of lien scope motion for summary judgment.	0.40	\$315.60

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Invoice 190155022

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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Date	Timekeeper	Task	Description	Hours	Amount
06/05/20	Joshua A. Esses	206	Call with M. Dale and team on lien scope adversary AP (partial) (0.70); Research on debt documents in support of lien scope AP (1.10).	1.80	\$1,420.20
06/08/20	Brooke H. Blackwell	206	Draft extension motion for ERS solicitation motion pursuant to executive orders issued by governor (0.70); Internal communication with L. Stafford regarding same (0.10); Revise internal reference materials for disclosure statement (0.30).	1.10	\$867.90
06/09/20	Brooke H. Blackwell	206	Revise draft extension motion for ERS solicitation pursuant to executive orders issued by governor (0.60); Communication with L. Stafford regarding same (0.20).	0.80	\$631.20
06/09/20	Laura Stafford	206	Review and revise draft PBA and ERS extension motions (1.00).	1.00	\$789.00
06/09/20	Laura Stafford	206	Revise draft omnibus objections (2.10).	2.10	\$1,656.90
06/10/20	Jeffrey W. Levitan	206	Review draft Coopertiva claim objection and e-mail L. Stafford regarding same.	0.50	\$394.50
06/10/20	Laura Stafford	206	Review and revise ERS return date extension motion (0.50).	0.50	\$394.50
06/11/20	Jeffrey W. Levitan	206	Review draft objection to Coopertiva claims (0.60); Review Coopertiva pleadings and decision to evaluate objection (1.30); E-mails L. Stafford, P. Possinger regarding claims objection (0.40).	2.30	\$1,814.70
06/11/20	Paul Possinger	206	Review and revise Cooperativas claim objection (1.20); E-mail to L. Stafford and team regarding same (0.20).	1.40	\$1,104.60
06/11/20	Joshua A. Esses	206	Review bondholders 12(c) motion (0.50); Call with M. Volin regarding 12(c) motion (0.10).	0.60	\$473.40
06/11/20	Ehud Barak	206	Call with J. Levitan regarding bondholders' 12(C) motion (0.30); Review and draft outline for the response (1.80).	2.10	\$1,656.90
06/12/20	Brooke H. Blackwell	206	Review order regarding ERS solicitation extension (0.10); Draft notice for publication (0.10).	0.20	\$157.80
06/12/20	Ehud Barak	206	Prepare for call (1.80); Review and create an outline for response for 12(c) motion (3.80); Call with the M. Dale and litigation team on response (1.00).	6.60	\$5,207.40
06/12/20	Joshua A. Esses	206	Call with M. Dale and ERS team on 12(c) motion (1.00); Review 12(c) complaint (1.80).	2.80	\$2,209.20
06/12/20	Megan R. Volin	206	Review bondholders' 12(c) motion and prepare outline (1.50); E-mails with J. Esses regarding 12(c) motion (0.10).	1.60	\$1,262.40

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Invoice 190155022

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

Page 5

Date	Timekeeper	Task	Description	Hours	Amount
06/13/20	Joshua A. Esses	206	Call with M. Dale and others on 12(c) response.	0.50	\$394.50
06/14/20	Brooke H. Blackwell	206	Draft and revise notice for publication for extension of ERS solicitation deadline (0.40); E-mail with L. Stafford regarding same (0.10); E-mail drafts to Prime Clerk for publication (0.10).	0.60	\$473.40
06/15/20	Joshua A. Esses	206	Draft outline of 12(c) response on 1111(b) issues.	2.80	\$2,209.20
06/16/20	William D. Dalsen	206	Draft joint informative motion regarding ERS lien-scope and ultra-vires briefing and discovery schedule (0.40).	0.40	\$315.60
06/16/20	Ehud Barak	206	Review and revise outline for 12(c) response (2.60); Confer with J. Levitan regarding same (0.20).	2.80	\$2,209.20
06/17/20	William D. Dalsen	206	Draft initial outline for opposition to ERS Bondholders' Rule 12(c) motion for judgment on the pleadings (1.50).	1.50	\$1,183.50
06/17/20	Joshua A. Esses	206	Draft outline to bondholder 12(c) motion on recourse issues (3.50); Call with M. Dale and team on response (0.80); Confer with J. Levitan regarding same (0.40).	4.70	\$3,708.30
06/17/20	Elisa Carino	206	Update draft motion to extend deadlines in ultra vires/lien scope proceedings.	0.30	\$236.70
06/18/20	Joshua A. Esses	206	Review bondholder response to 12(b) motion and draft response.	5.70	\$4,497.30
06/18/20	Matthew A. Skrzynski	206	Review response to ERS 12(b) motion regarding bondholder admin expense claim.	2.30	\$1,814.70
06/18/20	Elisa Carino	206	Draft motion and proposed order to modify briefing schedule in ultra vires and lien scope matters.	2.80	\$2,209.20
06/18/20	Matthew A. Skrzynski	206	Participate in call with M. Dale, J. Levitan and others regarding response to ERS 12(b) motion (1.00); E-mails with same regarding same (0.10).	1.10	\$867.90
06/18/20	Ehud Barak	206	Review and revise outline response for ERS 12(c) regarding 1111(b) issues.	1.10	\$867.90
06/18/20	Ehud Barak	206	Review and revise the response to the 12(b) motion (2.50); Discuss response internally with M. Dale and team (1.00).	3.50	\$2,761.50
06/19/20	Jonathan E. Richman	206	Draft and review e-mails with M. Morris, J. Esses, J. Levitan, M. Dale regarding reply on motion to dismiss expense claims.	0.40	\$315.60
06/19/20	Matthew A. Skrzynski	206	Correspond with W. Dalsen regarding 12(c) motion response outline.	0.20	\$157.80
06/19/20	Matthew A. Skrzynski	206	Review and revise outline response to 12(c) motion.	0.70	\$552.30
06/19/20	Joshua A. Esses	206	Draft 12(b) reply outline.	0.90	\$710.10

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Invoice 190155022

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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Date	Timekeeper	Task	Description	Hours	Amount
06/20/20	Jonathan E. Richman	206	Review motion and opposition papers for motion to dismissing expense claim, in preparation for reply brief.	2.60	\$2,051.40
06/20/20	Ehud Barak	206	Review and revise outline for ERS 12(b) motion response.	4.70	\$3,708.30
06/21/20	Joshua A. Esses	206	Call with M. Dale and constitutional law team on ERS 12(b) reply in support (0.50); Draft 12(b) reply outline (4.40).	4.90	\$3,866.10
06/22/20	Jeffrey W. Levitan	206	E-mails and teleconferences with M. Dale and E. Barak regarding 12(c) response (0.50); E-mails to S. Weise and M. Skrzynski regarding 12(c) response (0.40); E-mail regarding Kim regarding expert report (0.10); E-mail W. Dalsen regarding 12(c), e-mail C. Febus regarding 12(b) (0.30); Revise outline of 12(c) response (3.90); Participate in call with J. Esses and team regarding 12(b) response (1.10).	6.30	\$4,970.70
06/22/20	Jeffrey W. Levitan	206	Teleconference J. Esses regarding 12(b) response.	0.30	\$236.70
06/22/20	Joshua A. Esses	206	Draft outline of 12(b) reply (0.90); Call with J. Levitan and group on 12(b) reply (1.10).	2.00	\$1,578.00
06/22/20	Elisa Carino	206	Update and revise motion to extend deadlines in ultra vires and lien scope cases.	0.70	\$552.30
06/22/20	William D. Dalsen	206	Review draft stipulation regarding discovery dispute with ERS bondholders (0.50); Revise draft stipulation regarding discovery dispute with ERS bondholders (0.70); Revise joint motion to modify schedule (1.10).	2.30	\$1,814.70
06/22/20	Chantel L. Febus	206	Review R. Gorkin draft of arguments for ERS reply.	0.80	\$631.20
06/22/20	Ehud Barak	206	Research regarding the 12(b) motion (2.40); Revise outline (0.80).	3.20	\$2,524.80
06/23/20	Ehud Barak	206	Review and revise the 12(c) outline (2.40); Discuss same with J. Levitan (0.50).	2.90	\$2,288.10
06/23/20	Kelly M. Curtis	206	Confer with R. Gorkin regarding reply brief in ERS, including preparation and review of materials.	0.90	\$710.10
06/23/20	William D. Dalsen	206	Draft opposition to Rule 12(c) motion regarding claims and administrative expense motions (3.50).	3.50	\$2,761.50
06/23/20	Matthew A. Skrzynski	206	Correspond with W. Dalsen regarding edits to draft outline response to 12(c) motion.	0.10	\$78.90
06/23/20	Michael A. Firestein	206	Review urgent motion on scheduling issues for impact on other adversaries (0.20).	0.20	\$157.80
06/24/20	Megan R. Volin	206	Draft response to 12(c) motion.	3.50	\$2,761.50

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Date	Timekeeper	Task	Description	Hours	Amount
06/24/20	Matthew A. Skrzynski	206	Draft portion of response to bondholder 12(c) motion.	1.00	\$789.00
06/24/20	Adam L. Deming	206	Draft reply section regarding property interests in bankruptcy jurisprudence.	3.30	\$2,603.70
06/24/20	William D. Dalsen	206	Draft opposition to Rule 12(c) motion concerning claims and administrative expense motions (6.00).	6.00	\$4,734.00
06/24/20	Kelly M. Curtis	206	Draft section of ERS reply brief regarding Contracts Clause, including preliminary research regarding authority cited in ERS response.	2.10	\$1,656.90
06/25/20	Kelly M. Curtis	206	Draft section of reply brief regarding Contracts Clause.	8.40	\$6,627.60
06/25/20	Ehud Barak	206	Review and revise the ERS outline (3.60); Discuss same with J. Levitan (0.30).	3.90	\$3,077.10
06/25/20	Matthew A. Skrzynski	206	Draft portion of response to bondholder 12(c) motion.	5.70	\$4,497.30
06/25/20	William D. Dalsen	206	Draft opposition to Rule 12(c) motion regarding claims and administrative expense motions (8.50).	8.50	\$6,706.50
06/25/20	Joshua A. Esses	206	Draft outline of 12(b) reply.	0.30	\$236.70
06/25/20	Adam L. Deming	206	Draft section regarding how Penn Central economic loss factor counsels toward dismissal.	1.90	\$1,499.10
06/25/20	Adam L. Deming	206	Draft section regarding how allegations do not amount to per se taking.	1.20	\$946.80
06/25/20	Megan R. Volin	206	Draft response to 12(c) motion (7.70); E-mails with J. Esses regarding response to 12(c) motion (0.20).	7.90	\$6,233.10
06/26/20	Megan R. Volin	206	Draft response to 12(c) motion.	1.10	\$867.90
06/26/20	Elliot Stevens	206	Revise ERS outline relating to section 407 (1.20); E-mails with E. Barak relating to same (0.20); Draft edits relating to same (0.70); E-mail same to E. Barak (0.10).	2.20	\$1,735.80
06/26/20	Adam L. Deming	206	Draft section regarding how investment back expectations factor weighs toward dismissal.	2.20	\$1,735.80
06/26/20	Adam L. Deming	206	Draft section regarding how character of government action Penn Central factor weighs toward dismissal of remaining Takings claim.	1.30	\$1,025.70
06/26/20	Adam L. Deming	206	Draft section regarding deficiency of public use takings claim in present case.	0.90	\$710.10
06/26/20	Adam L. Deming	206	Draft introduction to Takings reply section.	1.00	\$789.00
06/26/20	Adam L. Deming	206	Conduct final review of Takings reply draft section and circulate to R. Gorkin.	0.40	\$315.60
06/26/20	Joshua A. Esses	206	Draft reply in support of 12(b) motion.	1.20	\$946.80
06/26/20	Matthew A. Skrzynski	206	Draft portion of response to bondholder 12(c) motion.	0.70	\$552.30

Date	Timekeeper	Task	Description	Hours	Amount
06/26/20	William D. Dalsen	206	Complete draft opposition to Rule 12(c) motion regarding claims and administrative expense motion (6.20).	6.20	\$4,891.80
06/26/20	Ehud Barak	206	Review and revise the 12(b) outline.	2.80	\$2,209.20
06/26/20	Kelly M. Curtis	206	Draft and revise Contracts Clause section of reply brief.	9.50	\$7,495.50
06/27/20	Kelly M. Curtis	206	Draft and revise section of ERS reply regarding Contracts Clause.	4.50	\$3,550.50
06/27/20	Ehud Barak	206	Review and revise outline (1.50); Call with J. Esses, M. Dale and J. Levitan regarding 12(b) motion (0.80).	2.30	\$1,814.70
06/27/20	Joshua A. Esses	206	Review draft outline of 12(b) motion to dismiss (0.50); Call with J. Levitan and others on response (0.80).	1.30	\$1,025.70
06/28/20	Jeffrey W. Levitan	206	Teleconference E. Barak, e-mail J. Esses regarding 12(c) response (0.30); Revise 12(c) response (5.60); E-mails with S. Weise, W. Dalsen regarding 12(c) response, review draft inserts (0.50); Review 12(c) cases (0.40).	6.80	\$5,365.20
06/29/20	Joshua A. Esses	206	Draft response to 12(c) motion.	0.40	\$315.60
06/29/20	William D. Dalsen	206	Revise opposition to Rule 12(c) motion (3.20).	3.20	\$2,524.80
06/29/20	Jeffrey W. Levitan	206	E-mails with S. Weise, M. Dale, E. Barak regarding 12(c) response (0.50); Teleconferences W. Dalsen, E. Barak regarding 12(c) response (0.40); Review comments to expert report (0.40); Edit 12(c) response (5.80).	7.10	\$5,601.90
06/29/20	Jonathan E. Richman	206	Review plaintiffs' opposition to motion to dismiss for purposes of determining points for reply brief.	1.60	\$1,262.40
06/29/20	Megan R. Volin	206	Review 12(c) response (0.70); E-mails with W. Dalsen regarding response (0.10).	0.80	\$631.20
06/29/20	Ehud Barak	206	Review and revise the 12(c) outline (3.80); Discuss same with J. Levitan (0.20).	4.00	\$3,156.00
06/30/20	Matthew A. Skrzynski	206	Revise portion of response to bondholder 12(c) motion according to J. Levitan comments.	3.30	\$2,603.70
06/30/20	Ehud Barak	206	Review and revise the 12(c) brief (4.80); Conduct relevant research (2.70).	7.50	\$5,917.50
06/30/20	Megan R. Volin	206	Review and revise draft of 12(c) response.	1.20	\$946.80
06/30/20	William D. Dalsen	206	Revise opposition to Rule 12(c) motion (4.90).	4.90	\$3,866.10
06/30/20	Joshua A. Esses	206	Draft opposition to 12(c) motion.	0.80	\$631.20
Documents Filed on Behalf of the Board				226.60	\$178,787.40

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Non-Board Court Filings -- 207

Date	Timekeeper	Task	Description	Hours	Amount
06/02/20	Michael R. Hackett	207	Review recent docket activity (0.80).	0.80	\$631.20
06/11/20	Michael R. Hackett	207	Review docket activity and filings (0.90).	0.90	\$710.10
06/11/20	Timothy W. Mungovan	207	Review Court order scheduling briefing in action pending in Court of Federal Claims (0.20).	0.20	\$157.80
06/11/20	Timothy W. Mungovan	207	E-mails with K. Perra, M. Dale, and M. Firestein regarding Court order scheduling briefing in action pending in Court of Federal Claims (0.30).	0.30	\$236.70
06/11/20	Megan R. Volin	207	Review bondholders' 12(c) motion.	0.80	\$631.20
06/12/20	Kevin J. Perra	207	Review and analyze development in Court of Claims case.	0.50	\$394.50
06/15/20	Michael R. Hackett	207	Review recent filings (0.80); Correspondence with M. Dale and team regarding recent filings (0.20).	1.00	\$789.00
06/17/20	Matthew A. Skrzynski	207	Review ERS 12(c) motion for judgment on the pleadings regarding bondholder admin expense claim.	1.70	\$1,341.30
06/18/20	Michael R. Hackett	207	Review bondholders' opposition to motion to dismiss proofs of claim (1.60); Research regarding Bondholders' opposition to dismiss proofs of claim (0.70).	2.30	\$1,814.70
06/19/20	Chantel L. Febus	207	Review ERS motion to dismiss.	2.20	\$1,735.80
06/19/20	Matthew A. Skrzynski	207	Review ERS 12(c) motion for judgment on the pleadings regarding bondholder admin expense claim.	1.80	\$1,420.20
06/23/20	Elliot Stevens	207	Analyze ERS response to motion to dismiss bondholder claims relating to section 407 (0.80).	0.80	\$631.20
06/25/20	Elliot Stevens	207	Analyze ERS motion to dismiss claim (0.40); Analyze bondholder response (0.50); Draft outline response to same (1.10); E-mail same to E. Barak (0.10).	2.10	\$1,656.90
06/26/20	Michael R. Hackett	207	Correspondence with M. Dale and team regarding status and recent activity (0.30); Review recent filings (1.10).	1.40	\$1,104.60
06/28/20	Jonathan E. Richman	207	Review creditors' opposition to motion to dismiss administrative claim.	1.60	\$1,262.40
Non-Board Court Filings				18.40	\$14,517.60

Analysis and Strategy -- 210

Date	Timekeeper	Task	Description	Hours	Amount
06/01/20	Joshua A. Esses	210	Review ERS expert report on tracing analysis (0.20); Call with L. Levitan and team regarding same (0.60).	0.80	\$631.20

Date	Timekeeper	Task	Description	Hours	Amount
06/01/20	Mee R. Kim	210	E-mails with M. Dale and Brattle team regarding report progress (0.20); E-mails with M. Dale regarding same (0.20); E-mails with M. Dale and Proskauer team regarding draft expert report review (0.60); E-mails with same and N. Bassett regarding same (0.30); E-mails with W. Dalsen regarding document production teleconference (0.10); E-mails with M. Dale, W. Dalsen and Faegre Drinker Biddle team regarding same (0.10); Review documents regarding lien tracing strategy (0.40); E-mails with M. Dale, J. Roche and W. Dalsen regarding same (0.40); E-mails with same and O'Melveny team regarding same (0.30); Teleconference with M. Dale and litigation team regarding weekly progress (0.40); E-mails with M. Dale, J. Roche and W. Dalsen regarding fiscal agent deposition preparation (0.80); E-mails with same regarding overall deposition strategy (0.20); E-mails with same and O'Melveny team regarding deposition transcripts (0.10); Videoconference with litigation common interest counsel and ERS representative regarding deposition preparation (3.10).	7.20	\$5,680.80
06/01/20	Carl Mazurek	210	Call with M. Dale, J. Roche, W. Dalsen, R. Kim, and E. Carino regarding progress and strategy (0.40); Draft notice of deposition for J. Ramos (0.50); Review witness list and prepare for deposition of J. Ramos (1.40).	2.30	\$1,814.70
06/01/20	William D. Dalsen	210	Draft letter to counsel to ERS Bondholders regarding Mason Capital deposition (1.30); Correspondence with counsel to ERS Bondholders regarding deposition of Puerto Rico Funds (0.50); Correspondence with C. Mazurek regarding Puerto Rico Funds deposition (0.20); Revise deposition outline and exhibits for Puerto Rico Funds deposition tomorrow (3.60); Call with M. Dale, J. Roche, C. Mazurek, R. Kim, and E. Carino regarding ERS case status (0.40); Call with J. Levitan and J. Esses regarding Fiscal Agent deposition (0.60); Deposition preparation meeting with ERS witness (3.20).	9.80	\$7,732.20

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Date	Timekeeper	Task	Description	Hours	Amount
06/01/20	Jeffrey W. Levitan	210	Review Soto deposition notice (0.30); E-mails with W. Dalsen regarding discovery (0.50); Review M. Pocha e-mail regarding discovery (0.30); Participate in call with W. Dalsen and team regarding deposition preparation (0.60).	1.70	\$1,341.30
06/01/20	Steven O. Weise	210	Review expert report regarding tracing issues.	3.20	\$2,524.80
06/01/20	Jennifer L. Roche	210	E-mails with R. Kim and M. Dalsen regarding ERS witness depositions (0.10); Analysis regarding deposition preparation questions (0.30); Analysis regarding expert report (2.50); E-mails with R. Kim, W. Dalsen and M. Dale regarding expert report issues (0.30); E-mails with Committee counsel regarding draft expert report (0.10); Conference with M. Dale and ERS litigation team regarding case status and strategy (0.40); Analysis regarding questions for Bondholder deposition (0.40); E-mail with W. Dalsen regarding same (0.10); E-mail C. Martinez regarding expert report review and comments (0.20); Attend part of ERS witness deposition prep (1.70); Conference with J. Levitan, J. Esses, M. Dale and W. Dalsen regarding Fiscal Agent deposition (0.60).	6.70	\$5,286.30
06/01/20	Elisa Carino	210	Phone call regarding status of litigation with M. Dale, J. Roche, R. Kim, W. Dalsen, and C. Mazurek.	0.40	\$315.60

Date	Timekeeper	Task	Description	Hours	Amount
06/01/20	Margaret A. Dale	210	Review draft letter to bondholder regarding Mason Capital deposition follow-up (0.20); Review proposed topics/questions for ERS 30(b)(6) depositions (0.50); E-mails with R. Kim regarding deposition topics/questions (0.10); Participate in weekly update call with W. Dalsen and litigation team (0.40); Conference call with J. Levitan, J. Esses, J. Roche and W. Dalsen regarding deposition of fiscal agent (0.60); Review deposition topics/questions for fiscal agent (0.50); Deposition preparation of Cecile Tirado regarding Rule 30(b)(6) (lien scope) (1.50); E-mails with M. Pocha, W. Sushon and W. Dalsen regarding bondholder request to authenticate exhibits (0.30); Review comments on Doty draft expert report (0.20); E-mails with J. Roche regarding same (0.10); Review portion of 2017 deposition transcript of Cecile Tirado (1.50).	5.90	\$4,655.10
06/02/20	Margaret A. Dale	210	E-mails with M. Pocha and W. Dalsen regarding Cancel deposition preparation (0.20); Review bondholder request for information related to best interest test analysis related to ERS assets (0.20); Conference call with McKinsey and R. Kim regarding bondholder request for info related to best interest test analysis of ERS assets (0.30); Follow up e-mails with J. Esses, W. Dalsen, M. Zerjal and R. Kim regarding bondholder requests for McKinsey information (0.20); Conference call to prepare Luis Collazo for Rule 30(b)(6) deposition (ultra vires) (1.80); Review analysis of C. Martinez on draft Doty expert report (0.20); Continued review of 2017 Cecile Tirado deposition transcript (0.90); Conference call with Brattle regarding next draft and appendix (0.40).	4.20	\$3,313.80
06/02/20	Carlos E. Martinez	210	Review and analyze Doty expert report (1.80); Draft memorandum regarding conclusions in connection with same (0.80).	2.60	\$2,051.40
06/02/20	Steven O. Weise	210	Review expert report regarding tracing issues.	4.60	\$3,629.40

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Date	Timekeeper	Task	Description	Hours	Amount
06/02/20	Jennifer L. Roche	210	E-mail with C. Martinez regarding municipal finance expert report (0.20); Attend ERS witness deposition preparation session (1.80); E-mail with W. Dalsen regarding witness depositions (0.10); Analysis and outline for lien scope motion for summary judgment (2.90).	5.00	\$3,945.00
06/02/20	William D. Dalsen	210	Prepare for deposition of Puerto Rico Funds (3.30); Depose Puerto Rico Funds and Ricardo Ramos (5.80); Correspondence with B. Rosen and J. Levitan regarding deposition of Puerto Rico Funds (0.50); Draft correspondence to counsel to Puerto Rico Funds and Puerto Rico Investors Funds regarding Ramos deposition (1.20); Call with E. Carino regarding legal research on privilege assertions (0.20); E-mails with same regarding same (0.10).	11.10	\$8,757.90
06/02/20	Carl Mazurek	210	Review documents produced by Puerto Rico Funds in preparation for deposition of J. Ramos (0.90); Attend deposition of J. Ramos (5.80); Review exhibits from deposition of R. Engman (0.80).	7.50	\$5,917.50
06/02/20	Mee R. Kim	210	E-mails with O'Melveny team regarding ERS witness deposition preparation (0.20); Teleconference with M. Dale and Faegre Drinker Biddle team regarding bondholder document requests (0.30); E-mails with same attorneys regarding same (0.10); E-mails with M. Dale regarding same (0.10); E-mails with M. Dale and team regarding same (0.20); Videoconference with litigation common interest counsel and ERS representative regarding deposition preparation (1.80); E-mails with M. Dale, J. Roche and W. Dalsen regarding same (0.70); Videoconference with M. Dale and Brattle team regarding report progress (0.30); E-mails with M. Dale and Brattle team regarding same (0.30); E-mails with M. Dale regarding same (0.20); E-mails with W. Dalsen regarding fiscal agent deposition preparation (0.20); E-mails with W. Dalsen and Proskauer team regarding witness depositions (0.20); E-mail with R. Holm regarding deposition transcript (0.10).	4.70	\$3,708.30

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Date	Timekeeper	Task	Description	Hours	Amount
06/03/20	Mee R. Kim	210	E-mails with R. Holm regarding deposition transcript (0.20); E-mails with M. Dale, J. Roche and W. Dalsen regarding ERS witness preparation (0.10); Review documents produced by various parties (1.30); E-mails with M. Dale, W. Dalsen and Brattle team regarding same (0.70); E-mails with M. Dale and W. Dalsen regarding same (0.60); E-mails with Brattle team regarding draft report analysis (0.50); E-mails with M. Dale, J. Roche and W. Dalsen regarding same (0.60); Videoconference with common interest litigation teams and ERS witness regarding deposition preparation (1.70); Teleconference with W. Dalsen regarding fiscal agent deposition (0.40).	6.10	\$4,812.90
06/03/20	William D. Dalsen	210	Correspondence with counsel to participants in ultra-vires and lien-scope proceedings regarding deposition attendance (0.20); Correspondence with counsel to AAFAF and ERS bondholders regarding deposition matters (0.10); Revise deposition outline and potential deposition exhibits for deposition of Fiscal Agent (6.70); Call with counsel to AAFAF regarding Cancel deposition (0.30); Deposition preparation session with ERS witness (1.70); Call with counsel to ERS bondholders regarding upcoming depositions and discovery matters (0.50).	9.50	\$7,495.50
06/03/20	Steven O. Weise	210	Review issues regarding expert report regarding tracing.	4.40	\$3,471.60
06/03/20	Jennifer L. Roche	210	Analysis and outline motion for summary judgment on lien scope complaint (4.20); Conference with J. Esses regarding lien scope issues (0.30); E-mail M. Dale and W. Dalsen regarding lien scope motion for summary judgment analysis (0.10); E-mails with W. Dalsen, R. Kim and M. Dale regarding waterfall issues (0.10).	4.70	\$3,708.30
06/03/20	Jeffrey W. Levitan	210	Review deposition summary (0.20); Review Engman deposition transcript (0.90).	1.10	\$867.90

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Date	Timekeeper	Task	Description	Hours	Amount
06/03/20	Margaret A. Dale	210	Prepare Luis Collazo for deposition (2.00); E-mails with W. Dalsen and R. Kim regarding Brattle report and support/documentation for opinions (0.50); Review of prior deposition testimony of Cecile Tirado (0.60); E-mails with W. Dalsen regarding Cancel deposition/testimony (0.20); Review documents related to Tirado and Collazo depositions (1.00).	4.30	\$3,392.70
06/04/20	Jeffrey W. Levitan	210	Review analysis, e-mails R. Kim, J. Roche regarding lien scope issues (0.50); E-mails M. Dale regarding expert report (0.20); Review S. Weise analysis and e-mail, e-mails S. Weise regarding tracing issues (0.50); Participate in call with P. Hinton, S. Weise and team regarding tracing report (0.90).	2.10	\$1,656.90
06/04/20	Jennifer L. Roche	210	Draft outline for lien scope motion for summary judgment (1.50); E-mails with ERS team regarding motion for summary judgment (0.20); Draft statement of facts for motion for summary judgment (2.30); E-mails with W. Dalsen regarding litigation diligence (0.10); E-mail with Committee counsel regarding expert report (0.10); Attend portion of ERS witness prep (1.00).	5.20	\$4,102.80
06/04/20	Laura Stafford	210	E-mails with H. Bauer, J. Berman regarding ERS and PBA claim collection centers (0.10).	0.10	\$78.90
06/04/20	Steven O. Weise	210	Review expert report regarding tracing issues (3.90); Conference with Brattle, M. Dale, and R. Kim regarding same (0.90).	4.80	\$3,787.20
06/04/20	William D. Dalsen	210	Prepare for Fiscal Agent deposition (2.00); Take Fiscal Agent deposition (4.50); Call with M. Dale regarding Fiscal Agent deposition and ERS discovery matters (0.30); Deposition preparation meeting with ERS witness (1.80); Call with counsel to Committees and Government Parties regarding Cancel deposition tomorrow (0.50); Review documents pertaining to J. Cancel ahead of deposition tomorrow (1.00); Correspondence with L. Silvestro and S. Schaefer regarding issues with deposition transcripts and exhibits (0.10); Correspondence with counsel to AAFAF regarding ERS deposition (0.20).	10.40	\$8,205.60
06/04/20	Carl Mazurek	210	Attend deposition of A. Chang.	4.50	\$3,550.50

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Date	Timekeeper	Task	Description	Hours	Amount
06/04/20	Margaret A. Dale	210	Teleconference with W. Dalsen regarding Fiscal Agent deposition and Cancel deposition questions (0.30); Review outline for motion for summary judgment relating to lien scope issues (0.20); Review e-mail from N. Bassett regarding questions for Cancel (0.30); Attend preparation of Collazo for ERS 30(b)(6) deposition (1.50); Review documents relevant to Cancel deposition (1.00); Conference call with Brattle, J. Levitan, S. Weise and R. Kim regarding tracing rules for expert report (0.90).	4.20	\$3,313.80
06/04/20	Elisa Carino	210	Conduct review of Spanish-language documents in third-party productions to assist J. Roche and S. Schaefer.	0.40	\$315.60
06/04/20	Mee R. Kim	210	E-mails with Brattle team and O'Melveny team regarding draft expert analysis (0.10); E-mails with Brattle regarding same (0.50); E-mails with M. Dale, S. Weise, J. Levitan and E. Barak regarding same (0.20); E-mails with same and Brattle regarding same (0.40); Videoconference with J. Levitan and Brattle team regarding same (0.90); E-mails with M. Dale regarding same (0.10); E-mails with M. Dale and team regarding summary judgment motion preparation (0.10); E-mails with M. Pocha and A. Mohan regarding ERS witness preparation (0.30); Review documents regarding same (3.10).	5.70	\$4,497.30
06/05/20	William D. Dalsen	210	Attend deposition of J. Cancel and cross-examine witness (7.30); Correspondence with Court reporting agency regarding Cancel rough transcript (0.30); Correspondence with C. Mazurek regarding discovery correspondence from counsel to ERS Bondholders (0.40).	8.00	\$6,312.00

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Date	Timekeeper	Task	Description	Hours	Amount
06/05/20	Mee R. Kim	210	E-mails with Brattle team and M. Dale regarding draft expert analysis (0.80); E-mails with M. Dale, J. Roche, and W. Dalsen regarding same (0.10); E-mails with same and O'Melveny team regarding same (0.10); E-mails with M. Pocha and A. Mohan regarding ERS witness preparation (0.10); E-mails with J. Roche regarding summary judgment motion preparation (0.10); E-mails with R. Holm regarding deposition transcripts (0.30); E-mails with A. Mohan regarding bond documents (0.70); Teleconference with M. Dale and Faegre Drinker Biddle team regarding bondholder requests (0.10); Videoconference with common interest litigation teams and ERS witness regarding deposition preparation (1.70); E-mails with Brattle team regarding draft expert analysis (0.30); E-mails with M. Dale, J. Roche and W. Dalsen regarding same (0.10); Teleconference with Brattle team regarding same (0.90); E-mails with M. Dale and team regarding flow of funds (0.50); E-mails with ERS representative and O'Melveny team regarding deposition preparation (0.10); E-mails with Brattle team and A. Mohan regarding draft expert analysis (0.10); Review documents regarding same (0.80).	6.80	\$5,365.20
06/05/20	Steven O. Weise	210	Review of tracing issues (4.00); Conference with M. Dale and team regarding summary judgment (1.20).	5.20	\$4,102.80
06/05/20	Carl Mazurek	210	Attend deposition of Juan Cancel Alegria.	7.30	\$5,759.70
06/05/20	Margaret A. Dale	210	Attend portion of deposition of Juan Cancel Alegria (6.00); Conference call with McKinsey and R. Kim regarding Best interest test analysis and support (0.10); Prepare cross questions for Cancel (0.50); Conference call with W. Dalsen and B. Sushon regarding cross of Cancel (0.20); Conference call with J. Levitan, S. Weise, J. Roche and J. Esses regarding motion for summary judgment on lien scope complaint (1.20).	8.00	\$6,312.00

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Date	Timekeeper	Task	Description	Hours	Amount
06/05/20	Jeffrey W. Levitan	210	Review responses to subpoena (0.40); Review Ramos deposition transcripts (0.70); Participate in call with M. Dale regarding lien scope summary judgment (1.20); Review team e-mails regarding flow of funds (0.20).	2.50	\$1,972.50
06/05/20	Jennifer L. Roche	210	Attend portion of ERS witness deposition preparation sessions (1.50); Conference with M. Dale, J. Levitan, S. Weise and J. Esses regarding motion for summary judgment on lien scope (1.20); E-mails with ERS team regarding flow of funds (0.20); Draft motion for summary judgment (2.90).	5.80	\$4,576.20
06/06/20	Jeffrey W. Levitan	210	Review summary of BNY deposition, e-mail exchanges W. Dalsen regarding same.	0.30	\$236.70
06/06/20	William D. Dalsen	210	Correspondence with B. Rosen and J. Levitan summarizing key points from Fiscal Agent deposition (0.50); Attend deposition preparation session with ERS witness (3.70); Correspondence with counsel to SCC regarding expert discovery matters (0.20); Correspondence with M. Dale and J. Roche regarding ERS deposition preparation (0.20); Draft summary of key points from deposition of Juan Cancel (1.40); Correspondence with R. Kim regarding expert report on lien-tracing issues (0.10).	6.10	\$4,812.90
06/06/20	Steven O. Weise	210	Review of tracing issues.	5.30	\$4,181.70
06/06/20	Elisa Carino	210	Conduct review of Spanish-language documents in third-party productions to assist J. Roche and S. Schaeffer.	1.40	\$1,104.60
06/06/20	Margaret A. Dale	210	E-mails with J. Roche, R. Kim and W. Dalsen regarding Enabling Act language and English translation (0.40).	0.40	\$315.60
06/06/20	Jennifer L. Roche	210	E-mails with W. Dalsen and Committee counsel regarding expert report (0.10); E-mails with W. Dalsen, M. Dale and R. Kim regarding ultra vires issues (0.20); E-mails with W. Dalsen regarding depositions (0.10).	0.40	\$315.60

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Date	Timekeeper	Task	Description	Hours	Amount
06/06/20	Mee R. Kim	210	E-mails with Brattle team regarding draft expert analysis (1.90); E-mails with ERS representatives and O'Melveny attorneys regarding deposition preparation (0.10); E-mails with Proskauer team regarding fiscal agent deposition (0.20); Review same deposition transcript (0.90); E-mails with W. Dalsen regarding same (0.20); Review documents regarding draft expert analysis (6.30); E-mails with S. Schaefer regarding same (0.20); E-mails with A. Mohan regarding same (0.80); Videoconference with ERS representatives and common interest counsel regarding deposition preparation (3.70); E-mails with M. Dale, J. Roche, and W. Dalsen regarding ultra vires strategy (0.90); E-mails with M. Dale and W. Dalsen regarding expert engagement process (0.20); E-mails with W. Dalsen and C. Mullarney regarding same (0.20); Review documents regarding same (0.50); E-mails with R. Holm regarding deposition transcript (0.10); E-mails with Proskauer team regarding same (0.20); E-mails with M. Dale and W. Dalsen regarding lien scope litigation strategy (0.90).	17.30	\$13,649.70

Date	Timekeeper	Task	Description	Hours	Amount
06/07/20	Mee R. Kim	210	E-mails with Brattle team, Proskauer team and O'Melveny team regarding draft expert analysis (0.10); E-mails with Brattle team regarding same (1.00); E-mails with Proskauer team regarding same (0.40); E-mails with A. Mohan regarding lien scope strategy (1.70); E-mails with M. Dale and W. Dalsen regarding same (0.50); Review documents regarding same (5.20); Videoconference with W. Dalsen and C. Mullarney regarding expert engagement process (0.40); E-mails with M. Dale and W. Dalsen regarding same (0.10); E-mails with W. Dalsen regarding same (0.10); E-mails with M. Dale, J. Roche and W. Dalsen regarding ultra vires strategy (0.30); Videoconference with ERS representatives and common interest counsel regarding witness deposition preparation (2.20); E-mail with C. Mazurek regarding bond documents (0.10); E-mails with Brattle team and A. Mohan regarding same (0.30); E-mails with Proskauer team regarding L. Collazo deposition documents (0.10).	12.50	\$9,862.50
06/07/20	Carl Mazurek	210	Analyze and compare redactions to documents produced by ERS bondholders.	0.60	\$473.40
06/07/20	Jennifer L. Roche	210	E-mails with W. Dalsen and R. Kim regarding witness deposition issues (0.20); Review draft letters to bondholder counsel regarding discovery issues (0.50).	0.70	\$552.30
06/07/20	Margaret A. Dale	210	E-mails with W. Dalsen and R. Kim regarding production of documents (0.30); E-mails with W. Dalsen and R. Kim regarding preparation of Collazo for 30(b)(6) deposition (0.20).	0.50	\$394.50
06/07/20	Elisa Carino	210	Conduct second-level document review of third-party productions to assist J. Roche and S. Schaeffer.	2.30	\$1,814.70
06/07/20	Jeffrey W. Levitan	210	E-mails R. Kim, W. Dalsen, R. Kim regarding expert report, review summary of J. Cancel deposition (0.40); Review revised draft tracing report (1.20).	1.60	\$1,262.40
06/07/20	Steven O. Weise	210	Review of tracing issues and review of law regarding same.	3.30	\$2,603.70

Date	Timekeeper	Task	Description	Hours	Amount
06/07/20	William D. Dalsen	210	Correspondence with committees regarding discovery matters (0.40); Correspondence with M. Dale and R. Kim regarding opening expert report on lien-tracing matters (0.30); Attend deposition preparation meeting with ERS witnesses (2.00); Correspondence with M. Dale regarding ERS advance deposition exhibits (0.10); Draft letter to opposing counsel regarding Mason Capital deposition (2.00); Draft letter to opposing counsel regarding improper "redactions for relevance" (1.00); Draft letter to opposing counsel regarding deposition of Puerto Rico Funds (1.00).	6.80	\$5,365.20
06/08/20	Jeffrey W. Levitan	210	E-mails B. Rosen, J. Esses, R. Kim, M. Dale regarding expert report, discovery (0.50); Teleconference M. Dale regarding expert report (0.20); Teleconference E. Barak regarding expert report, discovery, claims motions (0.30); Review W. Dalsen, R. Kim e-mails regarding discovery, e-mail B. Rosen team regarding expert report (0.40); Draft comments to revised expert report (3.80).	5.20	\$4,102.80
06/08/20	Margaret A. Dale	210	Review and revise 3 letters to bondholders counsel related to follow-up from depositions (0.40); Teleconference with W. Dalsen regarding letter to bondholders counsel (0.20); Attend Rule 30(b)(6) deposition of Luis Collazo (portion) (5.00); Review draft expert report regarding lien tracing (2.10); Teleconference with J. Levitan regarding draft expert report (0.20).	7.90	\$6,233.10
06/08/20	Steven O. Weise	210	Review of tracing issues and review of law regarding same (3.10); Review expert report (1.30).	4.40	\$3,471.60
06/08/20	Joshua A. Esses	210	Review draft tracing report.	1.50	\$1,183.50
06/08/20	William D. Dalsen	210	Attend Day 1 of ERS deposition (Luis Collazo) (8.00); Prepare for same (0.60); Correspondence with counsel to ERS Bondholders regarding deposition matters and improper redactions (0.20); Correspondence with B. Rosen and J. Levitan regarding ERS, CW, AAFAF deposition day 1 (0.40); Correspondence with Court reporting agency regarding Collazo rough deposition transcript (0.10); Review draft expert report on lien-tracing matters (0.70).	10.00	\$7,890.00

Date	Timekeeper	Task	Description	Hours	Amount
06/08/20	Jennifer L. Roche	210	E-mails with W. Dalsen and Committee counsel regarding expert diligence (0.10); Review correspondence to Bondholders on discovery issues (0.20); Review e-mails regarding deposition summary (0.10); Review comments on lien tracing expert report (0.40); Attend portion of ERS witness deposition preparation (1.50); Analysis and drafting of lien scope summary judgment papers (3.70).	6.00	\$4,734.00
06/08/20	Elisa Carino	210	Conduct second level document review.	0.60	\$473.40
06/08/20	Carl Mazurek	210	Attend deposition of Luis Manuel Collazo Rodriguez (8.00).	8.00	\$6,312.00
06/08/20	Brian S. Rosen	210	Review W. Dalsen deposition update (0.20); Draft memorandum to W. Dalsen regarding same (0.10); Review discovery correspondence regarding Mason, etc. (0.30); Draft memorandum to Dalsen regarding same (0.10).	0.70	\$552.30
06/08/20	Mee R. Kim	210	E-mails with M. Pocha and A. Mohan regarding deposition preparation (0.50); Review documents regarding same (1.10); E-mails with A. Mohan regarding ERS documents (0.10); E-mails with W. Dalsen regarding deposition transcript (0.20); E-mails with A. Mohan regarding bondholder requests (0.10); Review documents regarding same (0.20); E-mails with S. Schaefer regarding same (0.10); E-mails with Proskauer team regarding same (0.60); E-mails with M. Dale and Faegre Drinker attorneys regarding same (0.20); Partial videoconference with ERS representatives and common interest counsel regarding deposition preparation (6.00); E-mails with Proskauer team regarding ERS depositions (0.40); E-mails with Brattle team regarding draft expert analysis (0.90); Review documents regarding same (2.50); E-mails with A. Mohan regarding same (0.60); E-mails with Proskauer team regarding same (0.50); E-mails with A. Mohan and Brattle regarding same (0.10); E-mails with R. Holm regarding deposition transcript (0.10); E-mails with Proskauer team regarding document production (0.10); Review draft expert report (1.40).	15.70	\$12,387.30

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Date	Timekeeper	Task	Description	Hours	Amount
06/09/20	Mee R. Kim	210	Videoconference on ERS representative deposition (partial) (3.60); E-mails with W. Dalsen regarding same (0.10); E-mails with R. Holm regarding deposition transcript (0.20); E-mails with Proskauer team regarding document productions (0.50); E-mails with common interest counsel regarding same (0.10); Review documents regarding draft expert analysis (1.30); E-mails with Brattle team regarding same (0.90); E-mails with A. Mohan regarding same (0.30); Videoconference with Brattle team and Proskauer team regarding draft expert analysis (2.40); Revise draft expert analysis (6.20); E-mails with Proskauer team regarding same (1.00); E-mails with M. Dale regarding project progress (0.10); E-mails with ERS representatives and common interest counsel regarding deposition documents (0.40); E-mails with A. Mohan regarding same (0.10); E-mails with M. Dale and W. Dalsen regarding same (0.10); Review documents regarding same (1.30).	18.60	\$14,675.40
06/09/20	Joshua A. Esses	210	Respond to e-mails from W. Dalsen on discovery.	0.20	\$157.80
06/09/20	Brian S. Rosen	210	Review correspondence with M. Dale and team regarding discovery depositions (0.40).	0.40	\$315.60
06/09/20	Steven O. Weise	210	Review of tracing issues and review of law regarding same (1.60); Review expert report (1.60); Confer with Brattle, M. Dale and team regarding expert report (2.00).	5.20	\$4,102.80
06/09/20	Carl Mazurek	210	Attend deposition of Luis Manuel Collazo Rodriguez (8.40).	8.40	\$6,627.60
06/09/20	William D. Dalsen	210	Attend Day 2 of deposition of ERS, Commonwealth, and AAFAF (Luis Collazo) (8.40); Correspondence with counsel to AAFAF regarding Tirado deposition (0.50); Call with opposing counsel regarding Tirado deposition (0.50); Call with counsel to AAFAF regarding Tirado deposition (0.40); Call with M. Dale regarding ERS deposition and next steps (0.20); Correspondence with team regarding proposed exhibits for Tirado deposition tomorrow (0.10).	10.10	\$7,968.90

Date	Timekeeper	Task	Description	Hours	Amount
06/09/20	Jeffrey W. Levitan	210	E-mails R. Kim regarding expert report (0.50); Review comments to draft expert report (1.40); Review report appendices (1.20); Review D. Fox e-mails, e-mails with M. Dale regarding discovery (0.50); E-mails W. Dalsen regarding discovery (0.30); Review comments, prepare for call with P. Hinton and Brattle team (0.50); Participate in call with P. Hinton and team regarding tracing expert report (2.30).	6.70	\$5,286.30
06/09/20	Margaret A. Dale	210	Attend Rule 30(b)(6) deposition of Luis Collazo (portion) (4.50); Review and revise draft expert report regarding lien tracing (2.40); Review J. Levitan edits to lien tracing report (0.50); E-mails with R. Kim, J. Levitan and S. Weise regarding draft expert report revisions (0.30); E-mails with bondholders, O'Melveny, and Proskauer regarding document production and fact discovery deadline (0.50); Conference call with Brattle, S. Weise, J. Levitan and R. Kim regarding draft expert report (2.00); E-mails with O'Melveny and other government parties regarding bondholder request to extend fact discovery/expert reports due to document production (0.40).	10.60	\$8,363.40
06/09/20	Jennifer L. Roche	210	E-mails with Bondholder counsel regarding document production and potential schedule change (0.20); E-mails with ERS litigation team regarding same (0.10); Review comments to draft lien tracing report (0.60).	0.90	\$710.10
06/10/20	Jennifer L. Roche	210	Analysis regarding potential schedule change (0.20); E-mail with W. Dalsen, R. Kim and M. Dale regarding same (0.10); Analysis of and comments to draft ultra vires expert report (1.50); Analysis regarding potential claim objection to Cooperativas claim regarding ERS participants' loans (1.80); E-mails with L. Stafford regarding same (0.10); Draft lien scope summary judgment motion (2.50).	6.20	\$4,891.80
06/10/20	Steven O. Weise	210	Review of tracing issues and review of law regarding same (4.00); Review expert report (1.20).	5.20	\$4,102.80

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Date	Timekeeper	Task	Description	Hours	Amount
06/10/20	Jeffrey W. Levitan	210	Review Chang deposition transcript (1.30); E-mails W. Dalsen regarding discovery (0.50); Review revisions and comment on expert report, draft list of issues (1.20); E-mails R. Kim regarding expert report, discovery (0.50); E-mails J. Esses regarding expert report (0.20); E-mail E. Barak regarding ultra vires (0.10); Review ultra vires expert report (1.40).	5.20	\$4,102.80
06/10/20	William D. Dalsen	210	Attend Day 3 of ERS Deposition (Cecile Tirado) (8.40); Correspondence with M. Dale, J. Roche, and R. Kim regarding expert discovery schedule (0.50); Call with counsel to AAFAF regarding ERS deposition and discovery matters (0.40); Call with M. Dale regarding ERS deposition and discovery matters (0.20); Correspondence with B. Rosen and J. Levitan regarding expert schedule (0.20); Correspondence with E. Chernus regarding production received from ERS Bondholders (0.10); Correspondence with counsel to AAFAF regarding ERS deposition and expert discovery matters (0.70).	10.50	\$8,284.50
06/10/20	Joshua A. Esses	210	E-mails with W. Dalsen regarding discovery questions.	0.40	\$315.60
06/10/20	Carl Mazurek	210	Attend deposition of Cecile Tirado Soto (8.40).	8.40	\$6,627.60
06/10/20	Brian S. Rosen	210	Review draft ERS expert schedule (0.20); Draft memorandum to M. Dale, et al., regarding same (0.10); Review motion for judgment on pleadings (2.10).	2.40	\$1,893.60
06/10/20	Margaret A. Dale	210	Review comments to draft Brattle expert report (0.70); E-mails with J. Levitan and R. Kim regarding Brattle report and open issues (0.40); E-mails with W. Dalsen and regarding Tirado Rule 30(b)(6) deposition (0.40); Teleconference and e-mails with W. Dalsen regarding extension of expert discovery (0.30).	1.80	\$1,420.20

Date	Timekeeper	Task	Description	Hours	Amount
06/10/20	Mee R. Kim	210	Videoconference on ERS representative deposition (partial) (7.50); E-mails with common interest counsel regarding same (0.20); E-mails with Proskauer team regarding same (0.20); E-mails with same team regarding document production (0.10); Review documents regarding same (0.20); E-mails with Proskauer team regarding Court deadlines (0.40); E-mails with R. Holm regarding deposition transcripts (0.20); E-mails with Brattle team regarding draft expert analysis (1.20); Review document regarding same (0.50); E-mails with M. Dale, J. Levitan, S. Weise, and J. Esses regarding same (0.60); Revise draft expert report (0.40); E-mails with Brattle team and common interest counsel regarding same (0.10); E-mails with M. Dale regarding same (0.20); E-mails with M. Dale and Brattle team regarding litigation strategy (0.10); E-mails with common interest counsel regarding draft expert report (0.10); E-mails with S. Schaefer regarding expert opposition research (0.20); E-mail with W. Dalsen and C. Mullarney regarding expert engagement (0.10).	12.30	\$9,704.70
06/11/20	Mee R. Kim	210	E-mails with Proskauer team regarding Court deadline (0.30); E-mails with R. Holm regarding deposition transcripts (0.10); E-mails with Brattle team regarding draft expert report (0.60); E-mails with A. Mohan regarding same (0.30); Teleconference with M. Dale regarding same (0.30); E-mails with S. Schaefer and Brattle team regarding ERS deposition exhibits (0.20); E-mails with M. Dale, J. Roche and W. Dalsen regarding draft expert report (0.20); Revise Doty draft expert report (4.80); E-mails with Proskauer team regarding same (0.30); E-mails with Proskauer team regarding draft Brattle expert report (0.10).	7.20	\$5,680.80

Date	Timekeeper	Task	Description	Hours	Amount
06/11/20	Margaret A. Dale	210	Review bondholder Rule 12(c) motion regarding recourse claims and administrative expense claims (2.50); Teleconference with R. Kim regarding expert disclosures (0.30); E-mails with W. Dalsen and J. Roche regarding staffing for Rule 12(c) opposition (0.20); E-mails with W. Dalsen regarding negotiations with bondholder over discovery (0.30); Review R. Kim edits to Doty expert report (0.30); Review decision by Court of Claims to unstay bondholder "Takings Claim" suit against the United States (0.20); E-mails with team regarding Court of Claims case (0.20); Review J. Levitan points regarding 12(c) motion (0.20); Review memorandum from Mason Capital that was withheld as privileged (0.20); Teleconference with J. Levitan regarding staffing issues (0.20).	4.60	\$3,629.40
06/11/20	Brian S. Rosen	210	Draft memorandum to M. Dale regarding meeting or judgment (0.10); Correspondence with M. Dale and Proskauer team regarding same (0.20); Review article regarding count of claims stay (0.20); Review J. El Koury memorandum regarding same (0.10); Draft memorandum to J. El Koury regarding same (0.10); Review W. Dalsen memorandum and exhibits regarding Mason (0.40); Draft memorandum to W. Dalsen regarding same (0.10).	1.20	\$946.80
06/11/20	Elliot Stevens	210	E-mails with J. Levitan, others relating to takings clause dischargeability and other issues (0.30).	0.30	\$236.70
06/11/20	William D. Dalsen	210	Correspondence with counsel to UCC regarding expert discovery matters (0.20); Correspondence with B. Rosen and J. Levitan regarding ERS Bondholder production of previously withheld document and analysis of the same (0.50); Review motion for judgment on the pleadings pertaining to administrative claims and expense motion (1.40); Call with M. Dale and J. Roche regarding ERS discovery and briefing status (0.70); Correspondence with T. Mungovan regarding Court of Federal Claims proceeding pertaining to ERS (0.20); Correspondence with counsel to AAFAF regarding ERS discovery matters (0.10).	3.10	\$2,445.90

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06/11/20	Steven O. Weise	210	Review of tracing issues and review of law regarding same (5.20); Review expert report (2.60).	7.80	\$6,154.20
06/11/20	Megan R. Volin	210	Call with J. Esses regarding bondholders' 12(c) motion (0.10); E-mails with J. Esses and litigation team regarding 12(c) motion (0.10).	0.20	\$157.80
06/11/20	Jeffrey W. Levitan	210	Analyze 12(c) motion, prepare list of issues and responses (2.60); Review takings (0.60); Review Vintero decision (0.30); Confer with E. Barak regarding 12(c) motion (0.30); Confer with M. Dale regarding same (0.20); E-mails with E. Barak, M. Dale, J. Esses regarding 12(c) reply (0.50); Develop arguments in connection with same (3.00); E-mails M. Volin, J. Esses, M. Dale, E. Stevens regarding 12(c) issues (0.50); E-mails W. Dalsen regarding discovery (0.20).	8.20	\$6,469.80
06/11/20	Jennifer L. Roche	210	Review and analyze Bondholders 12(c) motion (1.10); Conference and e-mails with W. Dalsen and M. Dale regarding ERS briefing strategy (0.70); Draft lien scope motion for summary judgment (3.70); E-mail with P. Possinger regarding claim objection to Cooperativas claim (0.10); E-mails with M. Firestein, M. Dale and W. Dalsen regarding takings clause claim in federal claims Court (0.10); E-mails with W. Dalsen and M. Dale regarding lien scope expert report (0.10); Review e-mails and additional documents produced by Bondholder (0.30); E-mails with W. Dalsen regarding impact of documents produced (0.10).	6.20	\$4,891.80

Date	Timekeeper	Task	Description	Hours	Amount
06/12/20	Jeffrey W. Levitan	210	Review Mason Capital document and Dalsen e-mails (0.30); Review S. Weise comments to expert report (0.40); E-mails S. Weise, review cases regarding offering statement (0.50); E-mails with R. Kim regarding expert report (0.50); Review analysis of non-recourse cases (0.30); Draft outline of 12(C) response (1.40); Review revised expert report (1.10); Review comments to Doty report (0.40); Participate in call with J. Esses and team regarding drafting 12(c) response (1.00); E-mail and teleconference M. Dale regarding expert report (0.30); Teleconference E. Barak regarding administrative claims (0.10); Review R. Kim comments to expert report (0.50); Review draft chart, A. Vargas e-mail regarding same (0.10); Participate in call with P. Hinton and team regarding revisions to report (1.10); Review Rule 2004 motion joinder (0.20).	8.20	\$6,469.80
06/12/20	Elisa Carino	210	Conference with J. Esses, J. Levitan, E. Barak, M. Dale, W. Dalsen, B. Rosen regarding 12(c) motion.	1.00	\$789.00
06/12/20	Matthew A. Skrzynski	210	Participate in call with M. Dale, J. Levitan and others regarding response to ERS judgment on the pleadings.	1.00	\$789.00
06/12/20	William D. Dalsen	210	Correspondence with L. Rappaport regarding ERS bondholder joinder to Ambac Rule 2004 motion (0.40); Call with M. Dale and team regarding claims and administrative expense motions (1.00); Call with counsel to SCC and AAFAF regarding discovery correspondence from ERS bondholders (0.50); Review discovery correspondence from ERS bondholders (0.40); Correspondence with M. Dale regarding ERS Bondholders' discovery letter (0.20); Correspondence with counsel to AAFAF regarding ERS bondholders' discovery letter (0.30); Call with counsel to AAFAF regarding ERS bondholders' discovery letter (0.50).	3.30	\$2,603.70

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06/12/20	Jennifer L. Roche	210	Analysis regarding draft expert report (0.40); Conference with J. Esses, J. Levitan, M. Dale and W. Dalsen regarding Bondholders 12(c) motion (1.00); E-mails and letters regarding proposed scheduling changes and discovery issues (0.20); E-mail with S. Weise regarding draft expert reports (0.20); E-mails with E. Barak regarding recourse on bonds (0.10); Draft motion for summary judgment on lien scope issues (3.20).	5.10	\$4,023.90
06/12/20	Margaret A. Dale	210	Conference with J. Levitan, E. Barak, J. Esses, W. Dalsen, J. Roche and E. Carino regarding Rule 12(c) motion opposition (1.00); Conference call with Brattle regarding lien tracing report (0.80); Review and revise statements regarding bases for Brattle expert report (0.20); Review letter from bondholder regarding ultra vires discover and request for extension of time (0.50); E-mails with M. Pocha and W. Dalsen regarding bondholder letter and response (0.20); Conference call with M. Pocha, W. Dalsen, counsel for Retirees and SCC regarding bondholder letter (0.80); Revise Brattle expert report (1.20); E-mails with S. Weise regarding ultra vires expert report (0.30).	5.00	\$3,945.00

Date	Timekeeper	Task	Description	Hours	Amount
06/12/20	Mee R. Kim	210	E-mails with Proskauer team regarding draft Brattle expert report (1.10); E-mails with Brattle team and common interest counsel regarding same (0.60); E-mails with Brattle team regarding same (1.20); E-mails with S. Schaefer regarding expert opposition research (0.20); E-mails with A. Mohan regarding draft Brattle expert analysis (0.30); E-mails with J. Levitan and J. Esses regarding same (0.20); Review documents regarding same (0.90); E-mails with J. Esses regarding same (0.10); E-mails with Proskauer team regarding draft Doty expert report (0.60); Revise draft Doty expert report regarding same (0.50); Revise draft Brattle expert report (5.90); E-mails with common interest counsel regarding same (0.40); E-mails with M. Dale regarding same (0.10); E-mails with S. Weise and Proskauer team regarding litigation strategy (0.10); E-mails with M. Dale and W. Dalsen regarding same (0.40); Videoconference with Brattle team and common interest counsel regarding same (1.10); E-mails with M. Dale regarding litigation strategy (0.20); E-mails with Proskauer team regarding Court deadlines (0.20).	14.10	\$11,124.90
06/12/20	Steven O. Weise	210	Review of tracing issues and review of law regarding same (2.70); Review expert report on tracing' review expert report on municipal financing and power to issue bonds (2.10).	4.80	\$3,787.20
06/12/20	Brian S. Rosen	210	Conference call (partial) with M. Dale and team regarding 12(c) action (0.50); Review R. Engman memorandum regarding certificate petition/conflict (0.10); Draft memorandum to J. El Koury regarding same (0.10); Review J. El Koury memorandum regarding same (0.10); Draft memorandum to M. Dale regarding bondholder update (0.10).	0.90	\$710.10
06/13/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds, including employee loans (1.30); Review revised expert report on tracing (3.20).	4.50	\$3,550.50
06/13/20	Brian S. Rosen	210	Review draft letter regarding Ultra Vires issues (0.10); Draft memorandum to M. Dale regarding same (0.10); Draft memorandum to M. Dale regarding update (0.10).	0.30	\$236.70

Date	Timekeeper	Task	Description	Hours	Amount
06/13/20	Margaret A. Dale	210	Conference call with J. Esses, W. Dalsen and E. Carino regarding opposition to Rule 12(c) motion (0.50); Review and revise draft letter responding to bondholders regarding discovery issues/privileged memorandum (0.50); E-mails with M. Pocha and W. Dalsen regarding letter to bondholders (0.20); Conference call with W. Dalsen, counsel for AAFAF, SCC, UCC and Retiree Committee regarding bondholder letter regarding discovery issues and our response (0.60); E-mails with W. Dalsen and Proskauer team regarding developments (0.20).	2.00	\$1,578.00
06/13/20	Mee R. Kim	210	E-mails with C. Mazurek, E. Carino and S. Schaefer regarding opposition expert research (0.20); E-mails with Brattle team and common interest team regarding draft expert report (0.90); E-mails with the Brattle team regarding same (0.20).	1.30	\$1,025.70
06/13/20	William D. Dalsen	210	Correspondence with AAFAF regarding ERS bondholders' discovery dispute (0.60); Call with M. Dale and J. Esses regarding opposition to ERS bondholders' Rule 12(c) motion pertaining to claims and administrative expense motion (0.50); Call with counsel to Committees and AAFAF regarding ERS Bondholders' discovery dispute (0.60); Correspondence with K. Lachter regarding clawback question (0.30); Review draft letter responding to ERS bondholders regarding discovery dispute (0.50); Draft letter to ERS bondholders regarding improper use of clearly privileged document (1.50).	4.00	\$3,156.00
06/13/20	Elisa Carino	210	Conference with J. Esses, M. Dale and W. Dalsen regarding research for opposition to 12(c) motion.	0.50	\$394.50
06/13/20	Jeffrey W. Levitan	210	Review S. Weise analysis of Doty report, e-mail E. Barak regarding same (0.30); Review draft and final letters regarding discovery issues, e-mails M. Dale regarding same (0.50); Review e-mails with M. Dale regarding discovery (0.10); E-mail R. Kim regarding expert report (0.10); Review legal memorandum inadvertently produced materials (0.70).	1.70	\$1,341.30

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Date	Timekeeper	Task	Description	Hours	Amount
06/14/20	Jeffrey W. Levitan	210	Review comments to expert report (0.90); Review correspondence and e-mails with M. Dale regarding discovery (0.20).	1.10	\$867.90
06/14/20	William D. Dalsen	210	Correspondence with M. Dale regarding ERS bondholder use of privileged document (0.40); Correspondence with counsel to AAFAF regarding ERS Bondholder use of privileged document (0.20); Draft correspondence to ERS bondholders regarding improper use of privileged document (0.20); Call with counsel to AAFAF and SCC regarding ERS bondholders' improper use of privileged document (0.60); [REDACTED: Work relating to court-ordered mediation] (1.10).	2.50	\$1,972.50
06/14/20	Mee R. Kim	210	E-mails with common interest counsel regarding draft expert report (0.40); E-mails with Brattle team regarding same (0.20); E-mails with S. Schaefer regarding bondholder letters (0.20); E-mails with M. Dale, J. Roche and W. Dalsen regarding draft expert report (0.10); E-mails with M. Dale and Proskauer team regarding bondholder requests (0.10); E-mails with common interest counsel and Brattle team regarding draft expert report (0.30); Review revised draft (6.30).	7.60	\$5,996.40
06/14/20	Margaret A. Dale	210	Review bondholder letter responding to our letter about discovery/privileged memorandum (0.30); Conference call with W. Dalsen, counsel for AAFAF, SCC, UCC and Retiree Committee regarding discovery issue/privileged memorandum (0.60); Teleconference with B. Gottlieb regarding ethical obligations regarding privileged document (0.20); Review B. Gottlieb research results regarding ethical obligations (0.40); Review draft response to bondholder letter and e-mails with W. Dalsen and M. Pocha regarding same (0.30).	1.80	\$1,420.20
06/14/20	Jennifer L. Roche	210	Analysis regarding ultra vires expert report (1.00); E-mails with Committee counsel regarding same (0.10).	1.10	\$867.90
06/14/20	Brian S. Rosen	210	Review letter from bondholders (0.10); Draft memorandum to M. Dale regarding same (0.10); Review M. Dale memorandum regarding same (0.10).	0.30	\$236.70

Date	Timekeeper	Task	Description	Hours	Amount
06/14/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds, including employee loans (2.40); Review revised expert report on tracing (2.10).	4.50	\$3,550.50
06/15/20	Jeffrey W. Levitan	210	Review Torido deposition transcript (1.70); Review and comment on revised draft expert report (1.30); Review S. Weise comments to expert report (0.40); E-mails with M. Dale regarding scheduling (0.20); Participate in call with P. Hinton and team regarding expert report (1.00); Review outline of 1111(b) response (0.30).	4.90	\$3,866.10
06/15/20	Laura Stafford	210	E-mails with J. Berman and B. Blackwell regarding PBA and ERS deadline extension notices (0.20).	0.20	\$157.80
06/15/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds, including employee loans (3.00); Review revised expert report on tracing (2.80).	5.80	\$4,576.20
06/15/20	Margaret A. Dale	210	E-mails with R. Kim regarding expert document production (0.20); [REDACTED: Work relating to court-ordered mediation] (0.20); [REDACTED: Work relating to court-ordered mediation] (0.30); E-mails with N. Bassett and M. Pocha regarding draft of ultra vires expert report (0.20); Participate in weekly meeting with litigation team regarding work to do (0.40); Review answers to questions posed by Brattle (0.20); Conference call with Brattle, Proskauer and O'Melveny regarding opening report (1.00).	2.50	\$1,972.50
06/15/20	Mee R. Kim	210	Participate in weekly teleconference with M. Dale and Proskauer litigation team regarding ERS case (0.40); E-mails with M. Dale and W. Dalsen regarding draft expert report (0.70); E-mails with M. Dale regarding same (0.20); E-mails with S. Weise and Proskauer team regarding same (0.10); Videoconference with Proskauer team, O'Melveny team and Brattle team regarding same (1.00); E-mails with M. Dale, S. Weise, J. Levitan and W. Dalsen regarding same (0.20); E-mails with W. Dalsen regarding same (0.20); E-mails with Proskauer team regarding deposition transcript (0.10).	2.90	\$2,288.10

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Date	Timekeeper	Task	Description	Hours	Amount
06/15/20	William D. Dalsen	210	[REDACTED: Work relating to court-ordered mediation] (0.30); [REDACTED: Work relating to court-ordered mediation] (0.10); [REDACTED: Work relating to court-ordered mediation] (0.40); Call with M. Dale and J. Roche regarding ERS litigation status (0.40); Call with lien tracing expert regarding report (1.00); [REDACTED: Work relating to court-ordered mediation] (1.30); [REDACTED: Work relating to court-ordered mediation] (0.90).	4.40	\$3,471.60
06/15/20	Elisa Carino	210	Analyze existing deadlines against proposed extensions to assist M. Dale with litigation strategy.	0.80	\$631.20
06/15/20	Jennifer L. Roche	210	Conference with M. Dale and litigation team regarding ERS case strategy and briefing (0.40); Analysis regarding materials for expert report (0.40); Conference with expert regarding report (1.00); E-mail with E. Carino regarding analysis of scheduling issue (0.10); E-mails with M. Pocha and N. Basset regarding ultra vires issues (0.10); Analysis regarding investor information for ultra vires expert report (2.00); Analysis regarding lien scope expert report and comments thereto (0.30).	4.30	\$3,392.70
06/16/20	Jennifer L. Roche	210	E-mail with W. Dalsen regarding ultra vires and lien scope discovery issues.	0.10	\$78.90
06/16/20	Margaret A. Dale	210	[REDACTED: Work relating to court-ordered mediation] (0.50); Review outline of 1111(b) argument in opposition to Rule 12(c) motion (0.50); [REDACTED: Work relating to court-ordered mediation] (0.30); [REDACTED: Work relating to court-ordered mediation] (0.50); [REDACTED: Work relating to court-ordered mediation] (0.30).	2.10	\$1,656.90

Date	Timekeeper	Task	Description	Hours	Amount
06/16/20	Mee R. Kim	210	E-mails with W. Dalsen, O'Melveny team and Brattle team regarding draft expert report (0.30); E-mails with Proskauer team regarding deposition transcript (0.20); E-mails with H. Mason regarding same (0.10); Review documents regarding same (0.50); E-mails with S. Schaefer regarding same (0.20); E-mails with M. Dale, A. Joseph, and D. Rosado regarding bondholder requests (0.10); E-mails with M. Dale regarding same (0.20); E-mail with Proskauer team regarding bondholder requests (0.20).	1.80	\$1,420.20
06/16/20	William D. Dalsen	210	[REDACTED: Work relating to court-ordered mediation] (0.50); Correspondence with L. Silvestro regarding Tirado final transcript and exhibit receipt (0.10); [REDACTED: Work relating to court-ordered mediation] (0.50); [REDACTED: Work relating to court-ordered mediation] (0.80); [REDACTED: Work relating to court-ordered mediation] (1.50); [REDACTED: Work relating to court-ordered mediation] (0.50); [REDACTED: Work relating to court-ordered mediation] (0.30); Correspondence with C. Mazurek and S. Schaefer regarding third-party productions (0.10).	4.30	\$3,392.70
06/16/20	Jeffrey W. Levitan	210	Teleconference E. Barak regarding 12(c) response (0.20); Review comments to 12(c) outline and team e-mails (0.30); E-mails E. Barak, M. Dale, review report on discovery issues (0.40); Review cases cited in 12(c) motion (2.70).	3.60	\$2,840.40
06/16/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds, including employee loans.	3.70	\$2,919.30
06/17/20	Megan R. Volin	210	Research for response to 12(c) motion and draft outline of response (6.50); Call with M. Dale, J. Levitan, E. Barak, W. Dalsen, and J. Esses regarding 12(c) response (0.80); E-mails with J. Levitan, E. Barak, and J. Esses regarding 12(c) response (0.10); Research credit bidding issues (0.30); Review J. Esses comments to outline (0.10).	7.80	\$6,154.20

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Date	Timekeeper	Task	Description	Hours	Amount
06/17/20	Lary Alan Rappaport	210	E-mails with M. Dale, M. Firestein, L. Stafford, P. Possinger and J. Alonzo regarding analysis and strategy for opposing motion for judgment on the pleadings (0.20).	0.20	\$157.80
06/17/20	Jeffrey W. Levitan	210	Review Hinton e-mail regarding report, e-mail M. Dale regarding advisory opinion issue (0.20); Teleconference J. Esses regarding 12(c) motion (0.40); E-mails J. Esses, M. Dale regarding 12(c) motion (0.50); Teleconference E. Barak regarding 12(c) motion (0.20); Draft outline of 12(c) response to prepare for team call (0.90); Participate in call with W. Dalsen and team regarding 12(c) response (0.80); Analyze revise 1111(b) outlines (0.70); E-mails M. Volin regarding 1111(b) issues (0.50); Research regarding 1111(b) (0.70); Review 1111(b) cases (1.10); Review advisory opinion briefing (0.90); Review 12(b) response (1.60).	8.50	\$6,706.50
06/17/20	Laura Stafford	210	E-mails with B. Blackwell and S. Ma regarding ERS/PBA notices (0.20).	0.20	\$157.80
06/17/20	Michael A. Firestein	210	Review and draft e-mail to M. Dale on 12(c) adversary ruling issues (0.20).	0.20	\$157.80
06/17/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds, including employee loans (0.90); Review revised tracing report (0.90).	1.80	\$1,420.20
06/17/20	Matthew A. Skrzynski	210	Discuss 12(c) response issues with E. Carino and W. Dalsen (0.40); Discuss 12(c) response issues (partial) with J. Levitan, J. Esses and others (0.40).	0.80	\$631.20

Date	Timekeeper	Task	Description	Hours	Amount
06/17/20	Mee R. Kim	210	E-mails with M. Zerjal and J. Esses regarding ERS operations (0.10); Prepare for videoconference with Brattle team (0.30); Videoconference with W. Dalsen, O'Melveny team, Brattle team, and ERS representatives regarding draft expert report (1.00); Teleconference with P. Hinton regarding same (0.70); E-mails with Brattle team, Proskauer team, and O'Melveny team regarding same (0.10); E-mails with Proskauer team regarding bondholder requests (0.10); E-mails with M. Dale and W. Dalsen regarding same (0.10); E-mails with M. Dale, W. Dalsen, and O'Melveny regarding same (0.20); E-mails with W. Dalsen regarding same (0.20); Review documents regarding same (0.60); E-mails with H. Mason regarding same (0.20); E-mails with R. Holm regarding deposition transcript (0.10); E-mails with S. Schaefer and L. Silvestro regarding same (0.10); E-mails with Brattle team regarding draft expert report (0.20); E-mails with M. Dale and Brattle team regarding same (0.10); E-mails with M. Pocha and A. Mohan regarding same (0.20); Review documents regarding same (0.30).	4.60	\$3,629.40
06/17/20	Brian S. Rosen	210	Review W. Dalsen memorandum regarding ERS update (0.10); Draft memorandum to W. Dalsen regarding same (0.10).	0.20	\$157.80
06/17/20	Margaret A. Dale	210	Conference call with ERS, AAFAF, and Brattle regarding expert report (1.00); Review bondholder's Rule 12(c) motion (0.80); Conference call with J. Levitan, E. Barak, J. Esses, M. Skrzynski, W. Dalsen, E. Carino regarding opposition to Rule 12(c) motion (0.80); Follow-up e-mails to obtain prior work product related to opposition to Rule 12(c) motion (0.50); Review prior briefing related to arguments concerning prematurity/advisory opinions/lack of standing to oppose Rule 12(c) motion (0.80); [REDACTED: Work relating to court-ordered mediation] (0.40); [REDACTED: Work relating to court-ordered mediation] (0.20).	4.50	\$3,550.50

Date	Timekeeper	Task	Description	Hours	Amount
06/17/20	William D. Dalsen	210	[REDACTED: Work relating to court-ordered mediation] (0.20); Call with expert and ERS regarding lien-scope report (1.00); Call with E. Carino regarding Rule 12(c) opposition research and briefing (0.40); [REDACTED: Work relating to court-ordered mediation] (0.30); Correspondence with counsel to AAFAF regarding discovery correspondence from ERS bondholders (0.30); Review and analyze ERS bondholder arguments and cases in Rule 12(c) motion (2.20).	4.40	\$3,471.60
06/17/20	Ehud Barak	210	Call with M. Dale and team with respect to 12(c) motion (0.80); Review and revise outline (1.80); Confer with J. Levitan regarding same (0.20).	2.80	\$2,209.20
06/17/20	Jennifer L. Roche	210	E-mails with W. Dalsen and E. Carino regarding scheduling issues (0.10); Draft statement of facts for lien scope summary judgment motion (0.80).	0.90	\$710.10
06/17/20	Carl Mazurek	210	Phone call with S. Schaefer regarding document productions (0.30); Research regarding prior testimony of B. Hildreth (1.90).	2.20	\$1,735.80
06/17/20	Elisa Carino	210	Conference with W. Dalsen and M. Skrzynski regarding research for opposition to 12(c) motion (0.40); Analyze cases cited in 12(c) motion (0.20); Conference (partial) with J. Levitan, M. Dale, W. Dalsen, J. Roche, J. Esses, M. Volin and M. Skrzynski regarding strategy to oppose 12(c) motion (0.30).	0.90	\$710.10
06/18/20	Margaret A. Dale	210	[REDACTED: Work relating to court-ordered mediation] (0.40); Conference call with J. Levitan, E. Barak, J. Esses, W. Dalsen, M. Skrzynski, J. Roche, E. Carino and M. Volin regarding Rule 12(b) response (1.00); Teleconference with R. Kim regarding bondholder request for financial documents and the McKinsey analysis (0.20); Conference call with R. Kim and McKinsey regarding bondholder request for information (0.20); Review Rule 12(b) opposition (1.00).	2.80	\$2,209.20
06/18/20	Paul Possinger	210	Review bondholder joinder to Ambac discovery motion.	0.40	\$315.60

Date	Timekeeper	Task	Description	Hours	Amount
06/18/20	Brian S. Rosen	210	[REDACTED: Work relating to court-ordered mediation] (0.10); [REDACTED: Work relating to court-ordered mediation] (0.10); [REDACTED: Work relating to court-ordered mediation] (0.10).	0.30	\$236.70
06/18/20	Carl Mazurek	210	Research regarding prior testimony of B. Hildreth.	2.70	\$2,130.30
06/18/20	Jennifer L. Roche	210	Conference call with M. Dale, J. Levitan, J. Esses, W. Dalsen and E. Barak regarding reply brief to 12(b) motion (1.00); Analysis regarding Bondholder opposition to motion to dismiss admin expense motion (2.50); E-mails with E. Carino regarding motion to modify schedule (0.10); E- mails with W. Dalsen regarding expert report (0.10); [REDACTED: Work relating to court-ordered mediation] (0.10).	3.80	\$2,998.20
06/18/20	William D. Dalsen	210	[REDACTED: Work relating to court-ordered mediation] (0.30); [REDACTED: Work relating to court-ordered mediation] (2.70); Review motion to claw back Cancio memorandum in local Commonwealth Court (0.50); Correspondence with M. Dale and J. Roche regarding expert reports (0.10); [REDACTED: Work relating to court-ordered mediation] (0.20); Review ERS Bondholders' opposition to Rule 12(b) motion to dismiss claims and administrative expense motions (1.00); Call with J. Levitan and J. Esses regarding Rule 12(b) motion to dismiss claims and administrative expense motions (1.00).	5.80	\$4,576.20
06/18/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds, including employee loans (3.00); Review revised tracing report (1.70).	4.70	\$3,708.30
06/18/20	Matthew A. Skrzynski	210	Correspond with W. Dalsen regarding outline of arguments regarding 12(c) motion.	0.10	\$78.90

Date	Timekeeper	Task	Description	Hours	Amount
06/18/20	Mee R. Kim	210	E-mails with Proskauer team, Brattle team, and O'Melveny team regarding draft expert report (0.20); E-mails with Proskauer team regarding same (0.10); E-mails with M. Dale, W. Dalsen and Brattle team regarding same (0.30); E-mails with Brattle team regarding same (0.80); Teleconference with P. Hinton regarding same (0.10); E-mails with O'Melveny team and Brattle team regarding same (0.40); E-mails with M. Pocha and A. Mohan regarding same (0.30); E-mails with M. Dale and W. Dalsen regarding same (0.40); E-mails with Proskauer team regarding bondholder requests (0.20); E-mails with M. Dale, J. Roche, and W. Dalsen regarding draft expert report (0.20); E-mails with W. Dalsen regarding same (0.10); E-mails with M. Dale and Brattle team regarding same (0.20); Review documents regarding same (0.40); E-mails with M. Dale, A. Joseph, and D. Rosado regarding bondholder requests (0.10); E-mails with M. Dale regarding same (0.20); E-mails with W. Dalsen and S. Schaefer regarding same (0.10).	4.10	\$3,234.90
06/18/20	Elisa Carino	210	Draft outline of response to 12(c) motion filed by Bondholders in connection with administrative expense claim to assist W. Dalsen (5.80); Call with J. Levitan, M. Dale, W. Dalsen, E. Barak, J. Esses, M. Volin, J. Roche, and M. Skrzynski regarding Bondholders opposition to 12(b) motion (1.00).	6.80	\$5,365.20
06/18/20	Jeffrey W. Levitan	210	Review revised expert report (1.30); E-mail W. Dalsen B. Rosen regarding discovery (0.20); Draft outline additional 12(c) arguments (0.90); Analyze 12(b) opposition, outline responses (2.90); Participate in call with J. Esses and team regarding 12(b) response (1.00).	6.30	\$4,970.70
06/18/20	Megan R. Volin	210	Review bondholders' response to 12(b) motion (3.50); Call with M. Dale, J. Levitan, E. Barak, W. Dalsen, and J. Esses regarding 12(b) response (1.00).	4.50	\$3,550.50

Date	Timekeeper	Task	Description	Hours	Amount
06/19/20	Mee R. Kim	210	E-mails with O'Melveny team and Brattle team regarding draft expert report (0.10); E-mails with Brattle team regarding same (0.10); E-mails with M. Dale and W. Dalsen regarding same (0.40); E-mail with J. Levitan, S. Weise and M. Dale regarding same (0.10); E-mails with M. Dale and J. Levitan regarding motion to dismiss briefs (0.10); E-mails with M. Dale regarding bondholder requests (0.50); Teleconference with M. Dale regarding same (0.10); E-mails with M. Dale, A. Joseph, and D. Rosado regarding same (0.20); Teleconference with M. Dale, A. Joseph, and D. Rosado regarding same (0.30); E-mail with W. Dalsen regarding same (0.10); E-mails with M. Dale, J. Alonzo, W. Dalsen and L. Stafford regarding same (0.40).	2.40	\$1,893.60
06/19/20	William D. Dalsen	210	Correspondence with C. Mazurek regarding Puerto Rico legal research on contractual issues (0.10); Correspondence with R. Kim regarding expert reports (0.10); Review ERS Bondholder Rule 12(c) motion arguments and cases (1.50); Revise draft outlines pertaining to opposition to ERS Bondholders' Rule 12(c) motion (3.60); Confer with J. Levitan regarding same (0.40).	5.70	\$4,497.30
06/19/20	Jeffrey W. Levitan	210	Review, prepare comments on revised expert report (3.70); E-mails with W. Dalsen regarding 12(c) response (0.50); E-mails with M. Dale, E. Barak regarding 12(c) response (0.30); E-mails R. Kim, E. Barak regarding expert report, 12(b) response (0.20); E-mails with J. Esses regarding 12(b) response (0.40); E-mails and teleconference M. Dale regarding 12(b) response (0.30); E-mails with E. Barak, W. Dalsen regarding 12(c) response (0.30); Review E. Barak comments to 1111(b) outline, e-mails with J. Esses regarding same (0.30); Teleconference with W. Dalsen regarding 12(c) response (0.40); Review Jefferson Conty 1111(b) analysis (0.40).	6.80	\$5,365.20
06/19/20	Megan R. Volin	210	Review bondholders' response to 12(b) motion (0.80); Review E. Barak comments to 12(c) response outline (0.10); E-mails with T. Singer regarding ERS pleadings (0.10).	1.00	\$789.00

Date	Timekeeper	Task	Description	Hours	Amount
06/19/20	Carl Mazurek	210	Research regarding prior testimony of B. Hildreth.	3.20	\$2,524.80
06/19/20	Brooke H. Blackwell	210	Review publication drafts of ERS solicitation notices for date extension (0.40); E-mail with E. Carino regarding same (0.10); E-mail with L. Stafford regarding same (0.10).	0.60	\$473.40
06/19/20	Margaret A. Dale	210	E-mails with J. Esses and J. Levitan regarding Rule 12(b) reply (0.20); Teleconference with J. Levitan regarding assistance for Rule 12(b) reply (0.20); E-mails with W. Dalsen regarding questions about outline of Rule 12(c) opposition (0.30); Review ERS bondholder request of 5/15 regarding financials of ERS (0.30); E-mails with R. Kim regarding bondholder 5/15 request (0.50); Conference call with R. Kim and McKinsey outside counsel regarding bondholder 5/15 request (0.20); Teleconference with R. Kim regarding same (0.20); E-mails with R. Kim and L. Stafford regarding bondholder 5/15 request (0.20); E-mails with J. Levitan and W. Dalsen regarding outline of Rule 12(c) opposition (0.30).	2.40	\$1,893.60
06/19/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds, including employee loans (2.20); Review revised tracing report (2.60).	4.80	\$3,787.20
06/19/20	Russell T. Gorkin	210	E-mail correspondence with C. Febus, M. Dale and team regarding reply to opposition to motion to dismiss contracts and takings clause claims, survey of relevant filings.	0.50	\$394.50
06/19/20	Chantel L. Febus	210	Review facts/background and constitutional arguments sections of ERS bondholders' response to motion to dismiss.	1.50	\$1,183.50
06/19/20	Chantel L. Febus	210	Review previous claims disallowance issues related to constitutional issues in ERS.	2.30	\$1,814.70
06/20/20	Russell T. Gorkin	210	Review and analyze motion to dismiss Contracts Clause and Takings Clause claims and bondholders' opposition regarding same.	2.50	\$1,972.50
06/20/20	Elisa Carino	210	Call with J. Levitan, M. Dale, E. Barak, J. Esses, W. Dalsen, M. Volin and J. Roche regarding outline of opposition to 12(c) motion.	1.00	\$789.00

Date	Timekeeper	Task	Description	Hours	Amount
06/20/20	Margaret A. Dale	210	Teleconference and e-mails with J. Levitan regarding Rule 12(c) opposition (0.30); Review outline for Rule 12(c) opposition (0.50); Review bondholder Rule 12(c) motion (0.90); E-mails with W. Dalsen regarding opposition to Rule 12(c) motion (0.20); Conference call with J. Levitan, E. Barak, J. Esses, J. Roche, W. Dalsen and E. Carino regarding opposition to Rule 12(c) motion (1.00).	2.90	\$2,288.10
06/20/20	Mee R. Kim	210	Review documents for Brattle team draft expert report (0.40); E-mails with Brattle team regarding same (0.20); E-mails with P. Hinton regarding upcoming ERS representative discussion with bondholders (0.10); E-mails with L. Stafford regarding bondholder requests (0.20); Review same information (0.30).	1.20	\$946.80
06/20/20	Jeffrey W. Levitan	210	Review, note comments on 12(c) response outline (1.40); Teleconferences and e-mails E. Barak, M. Dale, and W. Dalsen regarding Rule 12 motions (0.50); Participate in call regarding 12(c) response outline (1.00); Review E. Barak 12(b) analysis (0.20).	3.10	\$2,445.90
06/20/20	Megan R. Volin	210	Call with M. Dale, J. Levitan, E. Barak, W. Dalsen, J. Esses, and E. Carino regarding 12(c) response (1.00); Review 12(c) outline (0.10); Review pleadings related to 12(b) and 12(c) issues (2.80).	3.90	\$3,077.10
06/20/20	Jennifer L. Roche	210	E-mails with W. Dalsen regarding opposition to 12(c) motion (0.20); Analysis regarding outline for opposition brief (0.30); Conference call with W. Dalsen, M. Dale, J. Levitan and J. Esses regarding opposition brief (1.00).	1.50	\$1,183.50
06/20/20	Elliot Stevens	210	E-mails with J. Esses, W. Dalsen relating to discharge of Takings Clause claims (0.10).	0.10	\$78.90
06/20/20	William D. Dalsen	210	Call with J. Levitan and M. Dale regarding outline for opposition to ERS Bondholders' Rule 12(c) motion (1.00); Correspondence with J. Levitan and M. Dale regarding Rule 12(c) opposition outline (0.20); Revise draft outline for Rule 12(c) opposition (8.40).	9.60	\$7,574.40
06/20/20	Laura Stafford	210	E-mails with R. Kim regarding ERS discovery request (0.20).	0.20	\$157.80
06/20/20	Joshua A. Esses	210	Call on ERS 12(c) motion with M. Dale and team.	1.00	\$789.00

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Date	Timekeeper	Task	Description	Hours	Amount
06/21/20	Laura Stafford	210	Review and analyze draft ERS and PBA publication notices (0.20).	0.20	\$157.80
06/21/20	Jeffrey W. Levitan	210	Review pleadings to prepare for team call (0.30); Participate in call with M. Harris and team regarding constitutional issues and reply (0.50); Review revised 12(c) outline (0.40); Review revised 12(b) analysis (0.20).	1.40	\$1,104.60
06/21/20	Mee R. Kim	210	E-mails with M. Dale and W. Dalsen regarding upcoming ERS representative discussion with bondholders (0.10); E-mail with P. Hinton regarding same (0.10); Review draft expert reports (3.30).	3.50	\$2,761.50
06/21/20	Chantel L. Febus	210	Call with M. Harris and R. Gorkin regarding ERS reply brief.	0.30	\$236.70
06/21/20	Mark Harris	210	Teleconference with M. Dale and team regarding reply brief in ERS suit (0.50); Call with M. Dale, C. Febus, and R. Gorkin regarding same (0.30); Call with C. Febus regarding same (0.10).	0.90	\$710.10
06/21/20	Brian S. Rosen	210	Review lien scope/ultra vires draft report (2.10).	2.10	\$1,656.90
06/21/20	Russell T. Gorkin	210	Call with J. Levitan, J. Esses, M. Dale, M. Harris and C. Febus regarding reply to ERS opposition to motion to dismiss contracts and Takings Clause claims (0.50); Follow-up call with M. Dale, M. Harris and C. Febus regarding same (0.30); Review and analyze memorandums on Contracts and Takings Clause issues (1.20); Draft Contracts Clause argument tracker and develop potential responses (2.40).	4.40	\$3,471.60
06/21/20	Carl Mazurek	210	Review fiscal agent productions for notice of breach letters.	3.60	\$2,840.40
06/21/20	Margaret A. Dale	210	Conference call with J. Levitan, M. Harris, C. Febus, R. Gorkin and J. Esses regarding Rule 12(b) reply and constitutional issues (0.50); Conference call with M. Harris, C. Febus, and R. Gorkin regarding Rule 12(b) reply (0.30).	0.80	\$631.20
06/21/20	Chantel L. Febus	210	Call with J. Levitan, M. Harris and others regarding constitutional section for ERS reply brief.	0.50	\$394.50
06/21/20	Chantel L. Febus	210	Communications with associates, M. Dale, and M. Harris regarding issues for ERS reply brief constitutional law sections.	0.60	\$473.40
06/21/20	Chantel L. Febus	210	Call and e-mails with M. Harris regarding ERS reply brief.	0.20	\$157.80

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Date	Timekeeper	Task	Description	Hours	Amount
06/21/20	Chantel L. Febus	210	Communications with associates, M. Dale, and M. Harris regarding research for ERS reply brief constitutional law sections.	0.40	\$315.60
06/22/20	Mark Harris	210	Teleconference with C. Febus and team regarding ERS reply brief.	0.70	\$552.30
06/22/20	William D. Dalsen	210	[REDACTED: Work relating to court-ordered mediation] (0.40); Correspondence with R. Kim regarding expert discovery matters and discovery correspondence from ERS bondholders (0.40); Call with Committees regarding case strategy (0.50); Call with M. Dale and J. Roche regarding ERS case schedule (0.40); Call with J. Levitan and J. Esses regarding Rule 12(b) reply (1.10); Confer with M. Dale and E. Carino regarding motion to revise schedule (0.20).	3.00	\$2,367.00
06/22/20	Adam L. Deming	210	Attend call with M. Harris, C. Febus, and R. Gorkin regarding Contracts and Takings Claims in ERS adversary proceeding (0.70); Review fact pattern in motion to dismiss filing on behalf of Board in ERS adversary proceeding in preparation for call (0.70).	1.40	\$1,104.60
06/22/20	Adam L. Deming	210	Review motion to dismiss filing and response thereto in preparation for drafting of reply.	2.20	\$1,735.80
06/22/20	Elisa Carino	210	Phone call regarding status of litigation with M. Dale, J. Roche, and W. Dalsen (0.40); Conference with W. Dalsen and M. Dale regarding motion to revise schedule (0.20).	0.60	\$473.40
06/22/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds, including employee loans; Review revised tracing report; Review issues regarding recourse.	5.80	\$4,576.20
06/22/20	Matthew A. Skrzynski	210	Draft correspondence to J. Levitan regarding outline of Reading doctrine application in connection with ERS administrative claims motions.	1.00	\$789.00
06/22/20	Matthew A. Skrzynski	210	Participate (partial) in call with J. Esses, M. Dale, J. Levitan and others discussing response to bondholder 12(b) reply.	0.80	\$631.20
06/22/20	Carl Mazurek	210	Draft summary of research on Bartley Hildreth (1.50); Call with M. Dale and ERS team regarding status of assignments (0.40).	1.90	\$1,499.10

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Date	Timekeeper	Task	Description	Hours	Amount
06/22/20	Megan R. Volin	210	Review 12(b) response and related pleadings (2.40); Call with M. Dale, J. Levitan, E. Barak, W. Dalsen, and J. Esses regarding 12(b) response (1.10); Review J. Levitan comments to 12(c) response outline (0.10).	3.60	\$2,840.40
06/22/20	Margaret A. Dale	210	Review draft stipulation to resolve discovery dispute concerning legal advice memorandum (0.20); Review supplemental interrogatory response from Altair (0.10); E-mails with W. Dalsen, J. Levitan and B. Rosen regarding Altair status (0.20); Conference call with W. Dalsen and litigation team regarding status updates (0.40); Read Rule 12(b) motion opposition (2.40); Conference call with J. Levitan and teams to discuss Rule 12(b) reply (1.10); E-mails with W. Dalsen regarding stipulation to resolve discovery dispute (0.20); Review revised schedule for lien scope/ultra vires proceedings (0.30); Conference call with W. Dalsen, J. Roche, R. Kim and E. Carino regarding revised schedule for lien scope/ultra vires (0.20); E-mails with J. Levitan, B. Rosen and W. Dalsen regarding revised schedule for lien scope/ultra vires (0.20); E-mails with Government Parties, Committees and bondholders regarding joint motion for revised schedules for lien scope/ultra vires (0.30).	5.60	\$4,418.40
06/22/20	Jennifer L. Roche	210	Conference with M. Dale and ERS Litigation team regarding case status and strategy (0.40); Confer with M. Dale and E. Carino regarding scheduling motion (0.20); Conference with J. Esses, J. Levitan, M. Dale and W. Dalsen regarding motion to dismiss administrative expense motion reply brief (1.10); Analysis regarding proposed schedule (0.10); E-mail with E. Carino regarding schedule (0.10); Analysis and outline argument for opposition to 12(c) motion (3.00).	4.90	\$3,866.10
06/22/20	Laura Stafford	210	E-mails with J. Berman and B. Blackwell regarding ERS and PBA extension notices (0.10).	0.10	\$78.90
06/22/20	Laura Stafford	210	Call with J. Berman regarding claims centers and e-mail to B. Rosen regarding same (0.20).	0.20	\$157.80

Date	Timekeeper	Task	Description	Hours	Amount
06/22/20	Mee R. Kim	210	E-mails with Brattle team regarding upcoming ERS representative discussion with bondholders (0.60); E-mails with M. Dale and W. Dalsen regarding same (0.40); E-mails with O'Melveny team, M. Dale and W. Dalsen regarding same (0.80); Review documents regarding same (2.90); E-mails with S. Schaefer and L. Silvestro regarding deposition documents (0.30); E-mails with M. Dale regarding draft expert report (0.10); E-mails with S. Weise regarding same (0.10); E-mails with Brattle team regarding same (0.10); E-mails with S. Weise, J. Levitan, M. Dale, W. Dalsen and J. Esses regarding same (0.40); E-mails with M. Dale, J. Roche and W. Dalsen regarding draft expert reports (0.10); E-mails with Proskauer litigation team regarding expert opposition research (0.10); Teleconference with same team regarding litigation status and strategy (0.40); Teleconference with same team regarding proposed revision to litigation schedule (0.20); E-mails with same team regarding proposed revision (0.40); E-mails with E. Carino regarding same (0.20); E-mails with Proskauer litigation team and restructuring team regarding same (0.10).	7.20	\$5,680.80
06/22/20	Russell T. Gorkin	210	Teleconference with M. Harris and C. Febus regarding reply to ERS opposition to motion to dismiss contracts and Takings Clause claims (0.70); Draft Takings Clause argument tracker (2.40); Review and analyze motion to dismiss and opposition (1.20).	4.30	\$3,392.70
06/22/20	Chantel L. Febus	210	E-mails with M. Dale regarding staffing for ERS reply.	0.40	\$315.60
06/22/20	Chantel L. Febus	210	Review ERS pleadings and related memoranda.	2.00	\$1,578.00
06/22/20	Chantel L. Febus	210	Call with M. Harris, R. Gorkin and A. Deming regarding constitutional section for ERS reply brief (0.70); Call with M. Dale regarding same (0.20); E-mails with M. Harris, R. Gorkin and A. Deming regarding same (0.50).	1.40	\$1,104.60
06/22/20	Chantel L. Febus	210	E-mails with M. Dale and ERS team regarding reply brief (0.50).	0.50	\$394.50
06/22/20	Chantel L. Febus	210	Review Takings Clause argument tracker for ERS brief.	0.90	\$710.10

Date	Timekeeper	Task	Description	Hours	Amount
06/22/20	Chantel L. Febus	210	Review and annotate 926 and 552 decisions related to constitutional issues in ERS reply brief.	2.80	\$2,209.20
06/23/20	Chantel L. Febus	210	E-mails with R. Gorkin and others regarding ERS reply brief constitutional argument sections.	0.40	\$315.60
06/23/20	Brian S. Rosen	210	Review discovery correspondence and ultra vires memorandum.	0.30	\$236.70
06/23/20	Russell T. Gorkin	210	Call with K. Curtis regarding case background and reply in further support to dismiss Contract Clause claim.	0.90	\$710.10
06/23/20	Mee R. Kim	210	E-mails with S. Weise regarding draft expert report (0.20); E-mails with Brattle team regarding same (1.10); E-mails with M. Dale and Proskauer team regarding same (0.30); E-mails with Proskauer team and Brattle team regarding same (0.20); E-mails with Proskauer team regarding revised case schedule (0.10); E-mails with M. Dale and W. Dalsen regarding ERS representatives call with Jones Day (0.30); E-mails with J. Levitan regarding same (0.10); Videoconference with ERS representatives, Proskauer team, and O'Melveny team regarding ERS lien scope issues (1.00); Review documents regarding same (0.40); E-mails with O'Melveny team and Proskauer team regarding same (0.30); E-mails with M. Dale, J. Roche, and W. Dalsen regarding draft expert report (0.20); Review same draft (3.30).	7.50	\$5,917.50
06/23/20	Jeffrey W. Levitan	210	E-mail M. Volin, teleconference E. Barak regarding 12(c) response (0.50); Analyze First Circuit decisions, outline arguments from 12(b) reply (1.60); Review scheduling order, teleconference J. Esses regarding 12(b), e-mail R. Kim regarding expert report (0.50); Review S. Weise comments to expert report (0.30); Teleconference M. Dale regarding briefing, review draft discovery stipulation e-mail W. Dalsen regarding same, review team e-mails regarding expert report (0.50); Review issues for Corrado interview (0.30); Attend preparation call for Corrado interview (1.10); Analyze 12(b) response, outline reply (4.10).	8.90	\$7,022.10
06/23/20	Megan R. Volin	210	Review 552 Decision and pleadings related to 12(b) and 12(c) issues (2.60); E-mails with J. Levitan regarding 12(c) response (0.10).	2.70	\$2,130.30

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Date	Timekeeper	Task	Description	Hours	Amount
06/23/20	Jennifer L. Roche	210	Conference with M. Dale regarding lien scope motion for summary judgment (0.30); Analysis regarding 12(c) opposition on administrative expense motion (0.50); Conference with W. Dalsen regarding opposition brief (0.40); Conference and e-mails with W. Dalsen and M. Skrzynski regarding opposition brief (0.20); Review and analyze revised ultra vires expert report (1.00); E-mails with R. Kim regarding same (0.10); E-mails with Committee counsel regarding draft report (0.10); Draft argument for 12(c) opposition (2.60); Analysis regarding motion for summary judgment prep (0.20); E-mails with W. Dalsen and S. Schaefer regarding same (0.10).	5.50	\$4,339.50
06/23/20	Steven O. Weise	210	Review revised report regarding perfection of security interest in proceeds, including employee loans (3.60); Review revised tracing report (1.00); Review issues regarding recourse (1.70).	6.30	\$4,970.70
06/23/20	Adam L. Deming	210	Review motion to dismiss filing for Takings arguments.	2.90	\$2,288.10
06/23/20	Adam L. Deming	210	Review response to motion to dismiss for counterarguments regarding Takings Clause (1.10); Draft outline of arguments (1.70).	2.80	\$2,209.20
06/23/20	William D. Dalsen	210	Call with ERS regarding ERS Bondholder supplemental questions on ERS financial documents (1.10); [REDACTED: Work relating to court-ordered mediation] (0.70).	1.80	\$1,420.20

Date	Timekeeper	Task	Description	Hours	Amount
06/23/20	Margaret A. Dale	210	Review revised draft stipulation to resolve discovery dispute concerning legal advice memorandum (0.30); E-mails with W. Dalsen, J. Levitan, B. Rosen, M. Pocha and B. Sushon regarding same (0.50); Review bondholder questions for Cecile Tirado of ERS (0.40); Conference call to prepare Cecile for call with BHs regarding questions (0.80); Review edits to Brattle expert report (0.50); Revise Brattle expert report (1.20); E-mails with W. Dalsen and J. Roche regarding Rule 12(c) opposition and outline of points regarding same (0.40); E-mails with R. Kim and Brattle regarding expert report (0.40); E-mails with AAFAF regarding ERS joinder to Ambac 2004 (0.20).	4.70	\$3,708.30
06/24/20	Margaret A. Dale	210	Review J. Levitan and S. Weise edits to Rule 12(c) opposition outline (0.80); Review S. Weise e-mails related to authority for 12(c) opposition issues (0.20); Review and revise letter to bondholder related to questions for Cecile regarding ERS financials (0.40); Conference call with Cecile Tirado, counsel for bondholders and AAFAF, and R. Kim regarding questions about accounts (1.00); Follow-up conference call with Cecile Tirado, AAFAF, Brattle and R. Kim (1.10); E-mails with AAFAF and L. Stafford regarding order on bondholder joinder to Ambac Rule 2004 (0.20); Review Court order regarding bondholder joinder to Ambac Rule 2004 regarding cash/assets (0.20); E-mails with W. Dalsen, M. Pocha, B. Sushon and N. Bassett regarding revised draft stipulation to resolve discovery dispute concerning legal advice memorandum (0.30); E-mails related to ERS further production of documents (0.20).	4.40	\$3,471.60
06/24/20	William D. Dalsen	210	Correspondence with counsel to Committees and Government Parties regarding draft stipulation to resolve discovery dispute (0.30).	0.30	\$236.70

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Date	Timekeeper	Task	Description	Hours	Amount
06/24/20	Jennifer L. Roche	210	Review and comment on ultra vires expert report (2.00); E-mails with R. Kim regarding same (0.20); E-mails with Committee counsel regarding expert report (0.10); Draft argument for opposition to 12(c) motion (1.40); E-mails with J. Levitan and S. Weise regarding issues related to 12(c) opposition (0.10).	3.80	\$2,998.20
06/24/20	Jeffrey W. Levitan	210	Review comments to 12(c) response outline (0.50); E-mails with E. Barak regarding 12(c) outline, UCC issues (0.30); Review correspondence, e-mails M. Pachu, M. Dale regarding discovery (0.20); Review motion to dismiss claims, outline reply arguments (1.60); Review response to 12(b) motion, outline reply arguments (3.70); Review Rule 2004 joinder order (0.20).	6.50	\$5,128.50
06/24/20	Matthew A. Skrzynski	210	Review and revise outline to response to ERS 12(c) motion for judgment on the pleadings.	2.30	\$1,814.70
06/24/20	Elisa Carino	210	Analyze Series A and Series B bond specimens to assist W. Dalsen in drafting opposition to 12(c) motion.	3.40	\$2,682.60
06/24/20	Steven O. Weise	210	Review issues regarding tracing of proceeds.	3.20	\$2,524.80
06/24/20	Steven O. Weise	210	Review issues regarding perfection of security interest in employee notes.	4.20	\$3,313.80

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Date	Timekeeper	Task	Description	Hours	Amount
06/24/20	Mee R. Kim	210	E-mails with M. Pocha and A. Mohan regarding videoconference with ERS representatives and Jones Day (0.40); E-mails with M. Dale and W. Dalsen regarding same (0.40); E-mails with M. Dale, W. Dalsen, and O'Melveny team regarding same (0.80); E-mails with Proskauer team, O'Melveny team, and Jones Day regarding same (0.10); E-mails with Brattle team regarding same (0.70); Videoconference with O'Melveny team, ERS representatives, Jones Day team, Brattle team, and Proskauer team regarding lien scope (1.00); E-mails with M. Dale regarding same (0.10); E-mails with M. Dale, W. Dalsen and Brattle team regarding same (0.20); Videoconference with M. Dale, Proskauer team, and Brattle team regarding same (0.20); E-mails with Proskauer team, O'Melveny team and ERS representatives regarding same (0.20); Videoconference with M. Dale, Proskauer team, Brattle team, O'Melveny team, and ERS representatives regarding same (1.00); E-mails with A. Mohan regarding same (0.10); E-mails with L. Silvestro and S. Schaefer regarding deposition documents (0.30); E-mails with R. Holm regarding same (0.30); E-mails with J. Roche regarding draft expert report (0.50); Review same draft (2.10); E-mails with W. Dalsen and Proskauer team regarding document production (0.20); E-mails with Brattle team regarding same (0.20).	8.80	\$6,943.20

Date	Timekeeper	Task	Description	Hours	Amount
06/25/20	Mee R. Kim	210	E-mails with E. Chernus regarding document production (0.20); E-mails with Brattle team regarding same (0.40); E-mails with M. Dale, J. Levitan, W. Dalsen and Brattle team regarding draft expert report (0.30); E-mails with M. Dale and W. Dalsen regarding same (0.50); E-mails with M. Dale regarding same (0.10); E-mails with M. Dale, Proskauer team and Brattle team regarding same (0.60); E-mails with M. Pocha and A. Mohan regarding same (0.10); Video conference with M. Dale, Proskauer team, O'Melveny team and Brattle team regarding same (1.00); E-mails with R. Holm regarding deposition documents (0.20); E-mail with W. Dalsen and L. Silvestro regarding same (0.10).	3.50	\$2,761.50
06/25/20	Michael R. Hackett	210	Correspondence with M. Dale and team regarding status of ERS filings and strategic next steps (0.40).	0.40	\$315.60
06/25/20	Jeffrey W. Levitan	210	Draft preliminary statement for 12(b) motion (3.40); Teleconference J. Esses, e-mails W. Dalsen and team regarding 12(b) and (c) options (0.50); Confer with E. Barak regarding same (0.30); Revise 12(b) outline (0.60); Review P. Hinton and team e-mails regarding expert issues, review chart (0.50); Participate in call with P. Hinton and team regarding revisions to expert report (1.00).	6.30	\$4,970.70
06/25/20	Elisa Carino	210	Analyze Series C bond specimens to assist W. Dalsen in drafting opposition to 12(c) motion (0.90); Draft analysis of Series A, B. and C bond specimens in connection with same (3.20).	4.10	\$3,234.90
06/25/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	3.20	\$2,524.80
06/25/20	Steven O. Weise	210	Review issues regarding perfection of security interest in employee notes.	1.20	\$946.80
06/25/20	Carl Mazurek	210	E-mails with S. Schaefer regarding ERS litigation and discovery issues (0.50); E-mails with E. Carino regarding same (0.20).	0.70	\$552.30
06/25/20	William D. Dalsen	210	[REDACTED: Work relating to court-ordered mediation] (0.70).	0.70	\$552.30

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06/25/20	Jennifer L. Roche	210	Correspondence with Bondholders regarding Rule 2004 discovery (0.10); Correspondence with committee counsel regarding ultra vires expert report (0.10); Review proposed edits to report (0.20).	0.40	\$315.60
06/25/20	Margaret A. Dale	210	E-mails with R. Kim and W. Dalsen regarding finalizing Brattle expert report (0.50); Review Rule 12(c) motion (0.50); E-mails with W. Dalsen, J. Levitan, M. Volin and M. Skrzynski regarding Rule 12(c) opposition (0.30); E-mails with team regarding Rule 12(c) opposition draft (0.20); Review draft joinder for bondholder to join Ambac Rule 2004 (0.20); E-mails with L. Stafford regarding bondholder joinder to Ambac Rule 2004 (0.20); E-mail to bondholder regarding joinder for Ambac Rule 2004 related to cash/assets (0.20); Review e-mail from Brattle regarding revisions to report and figures (0.30); Conference call with Brattle, AAFAF and Proskauer regarding Brattle report (1.00); E-mails with W. Dalsen, M. Pocha, B. Sushon, C. Steege and N. Bassett regarding revised draft stipulation to resolve discovery dispute concerning legal advice memorandum (0.30); E-mails with Brattle regarding revisions to figures/exhibits (0.20).	3.90	\$3,077.10
06/25/20	Brian S. Rosen	210	Review materials regarding IRS claims (0.30); Draft memorandum to R. Holm regarding IRS call (0.10).	0.40	\$315.60
06/26/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding Rule 12 motions/expert report/timing generally (0.20); E-mails with AAFAF regarding additional production of documents related to tracing (0.20); Review draft letter to bondholders regarding follow-up from meeting with Cecile (0.20); E-mails with W. Dalsen, M. Pocha, B. Sushon, C. Steege and N. Bassett regarding revised draft stipulation to resolve discovery dispute concerning legal advice memorandum (0.30); Review outline of Rule 12(b) reply (0.80); E-mails with W. Dalsen and J. Levitan regarding Rule 12(c) and ripeness/advisory opinion issues (0.40); E-mails with Brattle regarding report (0.30).	2.40	\$1,893.60

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Date	Timekeeper	Task	Description	Hours	Amount
06/26/20	Jennifer L. Roche	210	Conference with expert regarding ultra vires expert report (0.70); Review revised report (0.20); E-mails with committee counsel regarding report (0.10); Review and analyze opposition to 12(c) motion (1.70); Review Tirado deposition transcript in connection with lien scope summary judgment issues (1.80).	4.50	\$3,550.50
06/26/20	William D. Dalsen	210	Revise draft proposed stipulation concerning discovery dispute (0.50); Correspondence with M. Dale and J. Esses regarding opposition to Rule 12(c) motion (0.10); Correspondence with Committees and Government Parties regarding proposed revisions to stipulation (0.10).	0.70	\$552.30
06/26/20	Laura Stafford	210	Review and analyze proposed schedule for radio advertisements (0.10).	0.10	\$78.90
06/26/20	Jeffrey W. Levitan	210	E-mail with R. Kim, J. Esses, and e-mail A. Vargas review exhibit regarding expert report (0.50); E-mails with E. Barak and M. Dale, and teleconference M. Dale regarding 12(c) issues (0.30); Review note comments on draft 12(c) response (1.80); Review ripeness arguments in ACP briefs (0.80); E-mails with W. Dalsen regarding 12(c) response (0.30); Revise outline of 12(b) reply (3.60).	7.30	\$5,759.70
06/26/20	Mee R. Kim	210	E-mails with Brattle team regarding draft expert report (0.50); E-mails with M. Dale, J. Levitan, W. Dalsen and J. Esses regarding same (0.30); E-mails with M. Dale, Proskauer team and Brattle team regarding same (0.20); E-mails with Brattle team and J. Esses regarding same (0.40); Videoconference with Brattle team regarding same (1.20); E-mails with M. Dale and W. Dalsen regarding same (0.10); E-mails with M. Dale and W. Dalsen regarding document production (0.30); E-mails with M. Dale, W. Dalsen and O'Melveny team regarding same (0.50); E-mails with M. Pocha, O'Melveny team, Proskauer team and Jones Day regarding same (0.10); E-mails with M. Pocha and A. Mohan regarding same (0.10); E-mails with W. Dalsen, E. Chernus and S. Schaefer regarding same (0.10); E-mail with M. Dale, J. Roche and W. Dalsen regarding draft expert report (0.10).	3.90	\$3,077.10

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Date	Timekeeper	Task	Description	Hours	Amount
06/26/20	Russell T. Gorkin	210	Review and revise Takings Clause reply brief section (0.50); E-mail correspondence with A. Deming regarding same (0.10).	0.60	\$473.40
06/26/20	Brian S. Rosen	210	Review revised materials regarding IRS subsidy claims (0.40); Conference call with O'Melveny regarding same (0.40); Draft memorandum to Citi team regarding same (0.20); Review T. Green memorandum regarding same (0.10); Teleconference with D. Brownstein regarding same (0.10); Review D. Brownstein memorandum regarding DLA role (0.10); Draft memorandum to D. Brownstein regarding same (0.10).	1.40	\$1,104.60
06/26/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	1.80	\$1,420.20
06/26/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds.	3.20	\$2,524.80
06/27/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	3.20	\$2,524.80
06/27/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds.	1.40	\$1,104.60
06/27/20	Mee R. Kim	210	E-mails with Proskauer team and Brattle team regarding draft expert report (0.10); E-mails with M. Dale and W. Dalsen regarding same (0.10); E-mails with M. Dale, W. Dalsen and common interest counsel regarding same (0.10); E-mails with M. Dale, J. Roche, and W. Dalsen regarding same (0.70); E-mails with O'Melveny team regarding same (0.10); E-mails with M. Dale and Proskauer team regarding same (0.90); Revise same draft (5.70); E-mails with M. Dale, J. Roche and W. Dalsen regarding Doty draft expert report (0.20); Review same draft (1.10).	9.00	\$7,101.00
06/27/20	Jeffrey W. Levitan	210	Review outline of 407 arguments (0.30); Review 12(b) reply outline to prepare for call (0.20); Participate in call with J. Esses and team regarding 12(b) reply, expert report and other pending matters (0.80); Review revised expert report (1.80); E-mails W. Dalsen regarding research issues, e-mails S. Weise, M. Dale regarding expert report (0.50); Review, note comments, outline revisions to 12(c) response (5.10).	8.70	\$6,864.30
06/27/20	Russell T. Gorkin	210	Review and analyze draft of reply in support of dismissal of contracts clause claim.	0.50	\$394.50

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Date	Timekeeper	Task	Description	Hours	Amount
06/27/20	William D. Dalsen	210	Correspondence with counsel to Committees regarding expert reports (0.30); Review draft lien-tracing report (1.70); Review draft ultra vires expert report (2.00).	4.00	\$3,156.00
06/27/20	Jennifer L. Roche	210	Analyze and comments to lien tracing expert report (2.70); E-mails with W. Dalsen, M. Dale, and R. Kim regarding same (0.20); Analysis regarding ultra vires expert report (0.70); E-mails with Committee counsel regarding expert report (0.10).	3.70	\$2,919.30
06/27/20	Margaret A. Dale	210	Teleconference with J. Levitan, E. Barak and J. Esses to discuss Rule 12(b) reply brief (0.80); Review and revise latest draft of Brattle expert report (3.00); E-mails with R. Kim, S. Weise, J. Roche, and W. Dalsen regarding draft expert report (0.40).	4.20	\$3,313.80
06/28/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding draft expert report (0.60); E-mails with M. Dale, W. Dalsen and common interest counsel regarding same (0.20); E-mails with M. Dale and W. Dalsen regarding same (0.10); Revise same draft (4.10); E-mails with Proskauer team and Brattle team regarding same (0.20).	5.20	\$4,102.80
06/28/20	Margaret A. Dale	210	Review and respond to R. Kim questions/comments regarding Brattle report (0.50); Review comments from Retiree Committee counsel to draft expert report (0.30); E-mail R. Kim regarding Retiree comments (0.20).	1.00	\$789.00
06/28/20	Steven O. Weise	210	Review issues regarding recourse.	3.60	\$2,840.40
06/28/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	1.70	\$1,341.30
06/28/20	Steven O. Weise	210	Review issues regarding perfection of security interest in proceeds.	1.30	\$1,025.70
06/28/20	Jennifer L. Roche	210	Review proposed edits to expert report (0.20); E-mails with Committees counsel regarding report (0.10); E-mails with S. Weise and J. Levitan regarding opposition to motion for judgment on the pleadings (0.10).	0.40	\$315.60

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Date	Timekeeper	Task	Description	Hours	Amount
06/29/20	Jennifer L. Roche	210	Conference and e-mails with expert and Committees counsel regarding ultra vires expert report (0.80); E-mails with W. Dalsen and M. Dale regarding expert report (0.10); Conference with ERS Litigation team regarding case status and strategy (0.40); E-mails with R. Kim regarding lien tracing report (0.10); Analysis regarding Tirado deposition for lien scope summary judgment motion (1.20); Review revised draft opposition to motion for judgment on the pleadings (0.60); E-mails with J. Levitan and W. Dalsen regarding draft brief (0.10).	3.30	\$2,603.70
06/29/20	Brian S. Rosen	210	Review P. Possinger memorandum regarding ERS letter/pension reconciliation (0.10); Draft memorandum to P. Possinger, et al. regarding same (0.10).	0.20	\$157.80
06/29/20	Elisa Carino	210	Phone call regarding status of litigation with M. Dale, J. Roche, and W. Dalsen.	0.40	\$315.60
06/29/20	William D. Dalsen	210	Call with J. Levitan regarding opposition to Rule 12(c) motion (0.20); Review draft lien-tracing expert report (0.40); Call with ERS lien-tracing expert regarding finalizing lien-tracing report (1.10); Call with M. Dale and J. Roche regarding ERS case status and next steps (0.40).	2.10	\$1,656.90
06/29/20	Laura Stafford	210	E-mails with J. Berman regarding Puerto Rico collection centers (0.10).	0.10	\$78.90
06/29/20	Steven O. Weise	210	Review issues regarding recourse claims for breach of covenants (6.00); Call with Brattle, M. Dale, W. Dalsen, and R. Kim regarding expert report (0.30).	6.30	\$4,970.70

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Date	Timekeeper	Task	Description	Hours	Amount
06/29/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding status on 12(b) and 12(c) motions (0.20); Review draft of Doty report (0.40); E-mails with R. Kim and W. Dalsen regarding finalizing Brattle report (0.50); Review comments from UCC on expert report (0.30); Review comments from Retiree Committee regarding expert report (0.40); E-mails with R. Kim, W. Dalsen and S. Weise regarding open issues/questions for Brattle (0.40); E-mails with AAFAF regarding review of expert report (0.20); Conference call with Brattle team, S. Weise, W. Dalsen and R. Kim to discuss questions/open issues with report (0.30); Weekly litigation group meeting to discuss deadlines/status (0.40); Teleconference with P. Friedman regarding Rule 12 motions (0.20); E-mails with Proskauer team regarding call with O'Melveny regarding Rule 12 motions/timing (0.20).	3.50	\$2,761.50
06/29/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding draft expert report (3.00); E-mails with Brattle team regarding same (2.80); E-mails with M. Dale, W. Dalsen and common interest counsel regarding same (3.10); E-mails with M. Dale regarding same (0.10); Videoconference with Proskauer team and Brattle team regarding same (1.00); Discussions with A. Mohan regarding same (0.10); Discussions with M. Dale regarding same (0.20); Discussions with H. Mason regarding same (0.10); E-mails with M. Dale, J. Roche and W. Dalsen regarding Doty draft expert report (0.20); Revise same draft (5.30); E-mails with Proskauer team regarding document production (0.40); E-mails with Proskauer team regarding weekly litigation team meeting (0.20); Teleconference with litigation team regarding same (0.40); E-mails with Proskauer team, common interest counsel, and bondholder team regarding lien scope analysis (0.10).	17.00	\$13,413.00

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Date	Timekeeper	Task	Description	Hours	Amount
06/30/20	Mee R. Kim	210	E-mails with M. Dale, Proskauer team and Brattle team regarding draft expert report (0.40); E-mails with Brattle team regarding same (3.10); E-mails with Proskauer team regarding same (3.50); Call and e-mails with M. Dale regarding same (0.50); Teleconferences with Brattle team regarding same (0.50); E-mails with M. Dale, W. Dalsen and common interest counsel regarding same (0.70); Revise draft report regarding same (4.10); E-mails with Proskauer team regarding document production (0.90).	13.70	\$10,809.30
06/30/20	Steven O. Weise	210	Review issues regarding recourse claims for breach of covenants.	5.40	\$4,260.60
06/30/20	Steven O. Weise	210	Review issues regarding tracing of collateral (0.60); Review revised expert report (0.70).	1.30	\$1,025.70
06/30/20	Chantel L. Febus	210	Review cases and legalrelated to constitutional analysis in ERS reply brief.	2.20	\$1,735.80
06/30/20	Chantel L. Febus	210	Review draft ERS constitutional law section drafts.	1.90	\$1,499.10
06/30/20	Margaret A. Dale	210	E-mails with W. Dalsen and J. Roche regarding Doty expert report (0.20); Review O'Melveny comments to Hinton expert report (0.40); Teleconferences with R. Kim regarding Hinton report (0.30); Review revised Hinton expert report in light of recent comments (1.40); Review comments to draft Rule 12(c) opposition (1.50); Teleconference with J. Levitan regarding Rule 12 reports (0.20); E-mails with R. Kim regarding finalizing Brattle report (0.50); E-mails with R. Kim and W. Dalsen regarding Brattle report and expert document productions (0.40).	4.90	\$3,866.10
06/30/20	Jeffrey W. Levitan	210	Revise introduction to expert report (0.30); Review AAFAF comments to expert report (0.40); Review revisions and comments to 12(c) reply (2.60); Teleconferences E. Barak, M. Dale regarding response, expert report (0.30); E-mails W. Dalsen and team regarding revisions to 12(c) response (0.50).	4.10	\$3,234.90
06/30/20	William D. Dalsen	210	Correspondence with M. Dale and J. Roche regarding Doty expert report (0.20); Review Doty expert report (1.10); Review Hinton expert report (1.40).	2.70	\$2,130.30

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Date	Timekeeper	Task	Description	Hours	Amount
06/30/20	Elisa Carino	210	Analyze deposition errata to assist W. Dalsen (1.10); Draft summary regarding same (0.30).	1.40	\$1,104.60
06/30/20	Jennifer L. Roche	210	Analyze and revise draft opposition to motion for judgment on the pleadings (2.60); E-mails with W. Dalsen, S. Weise and J. Levitan regarding opposition brief (0.20); Analyze and comment on draft ultra vires expert report (0.50); E-mail with W. Dalsen and M. Dale regarding report (0.20); E-mails with Committees counsel regarding expert report (0.10).	3.60	\$2,840.40
Analysis and Strategy				1,043.60	\$823,400.40

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Date	Timekeeper	Task	Description	Hours	Amount
06/01/20	Lawrence T. Silvestro	212	Telephone call with Court reporting agency regarding scheduling and logistics for remote depositions (0.60); Index and identify certain exhibits cited in multiple depositions produced (3.90).	4.50	\$1,215.00
06/01/20	Olaide M. Adejobi	212	Update deposition calendar and schedule per L. Silvestro.	0.40	\$108.00
06/01/20	Eric R. Chernus	212	Send new received production to vendor with loading and foldering instructions (0.40).	0.40	\$108.00
06/01/20	Shealeen E. Schaefer	212	Review additional results of targeted searches of Jones Day non-party production of over 19,000 documents to identify custodians and types of documents produced.	5.80	\$1,566.00
06/01/20	Shealeen E. Schaefer	212	Update and organize case databases to incorporate discovery materials and communications.	0.60	\$162.00
06/02/20	Shealeen E. Schaefer	212	Update databases to incorporate discovery materials and communications.	0.90	\$243.00
06/02/20	Shealeen E. Schaefer	212	Further review of targeted searches of non-party productions of over 19,000 documents to identify key documents and types of documents produced.	3.20	\$864.00
06/02/20	Eric R. Chernus	212	Quality-control loaded production and release documents to case team (0.30); Create document searches for new productions and update existing searches to include new document loads (0.60).	0.90	\$243.00

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Date	Timekeeper	Task	Description	Hours	Amount
06/02/20	Lawrence T. Silvestro	212	Download and upload electronic deposition files for internal use (0.70); Identify and index exhibits cited in multiple depositions produced (3.30).	4.00	\$1,080.00
06/02/20	Karina Pantoja	212	Call with L. Silvestro regarding ERS deposition exhibits (0.30); Organize same (0.80).	1.10	\$297.00
06/03/20	Karina Pantoja	212	Organize ERS deposition exhibits (4.20).	4.20	\$1,134.00
06/03/20	Lawrence T. Silvestro	212	Download and upload electronic deposition files for internal use (0.70); Identify and index exhibits and certain cited in multiple depositions (2.80).	3.50	\$945.00
06/03/20	Shealeen E. Schaefer	212	Review Christopher Delaney deposition transcript.	1.30	\$351.00
06/03/20	Shealeen E. Schaefer	212	Update case records to incorporate correspondence and key documents.	1.60	\$432.00
06/04/20	Olaide M. Adejobi	212	Review and check Ramos deposition exhibits for completeness per W. Dalsen.	0.30	\$81.00
06/04/20	Shealeen E. Schaefer	212	Review Ricardo Ramos deposition transcript.	1.40	\$378.00
06/04/20	Lawrence T. Silvestro	212	Download and process electronic deposition files for internal use (0.70); Review exhibits for completeness (1.10).	1.80	\$486.00
06/04/20	Karina Pantoja	212	Organize ERS deposition documents (3.50).	3.50	\$945.00
06/05/20	Shealeen E. Schaefer	212	Review Commonwealth's responses and objections to Bondholders' deposition subpoena regarding ultra vires topics.	0.30	\$81.00
06/05/20	Shealeen E. Schaefer	212	Review AAFAF's responses and objections to Bondholders' deposition subpoena regarding ultra vires topics.	0.20	\$54.00
06/05/20	Shealeen E. Schaefer	212	Review correspondence from Jones Day regarding confidentiality designations.	0.30	\$81.00
06/05/20	Shealeen E. Schaefer	212	Update databases to incorporate discovery materials and communications.	0.60	\$162.00
06/05/20	Shealeen E. Schaefer	212	Review correspondence from Jones Day regarding Engman deposition.	0.20	\$54.00
06/06/20	Shealeen E. Schaefer	212	E-mails with R. Kim verifying Bates ranges for certain document productions.	0.20	\$54.00
06/06/20	Shealeen E. Schaefer	212	Review production database to verify Bates ranges for certain document productions for attorney Rina Kim .	0.20	\$54.00
06/08/20	Shealeen E. Schaefer	212	Review production log to verify producing parties and custodians for certain historical production sets.	0.60	\$162.00
06/08/20	Shealeen E. Schaefer	212	Update case records to incorporate discovery materials and associated correspondence.	0.60	\$162.00

Date	Timekeeper	Task	Description	Hours	Amount
06/08/20	Shealeen E. Schaefer	212	E-mails with R. Kim regarding historical questions regarding relationships in the ERS cases.	0.10	\$27.00
06/08/20	Shealeen E. Schaefer	212	E-mails with C. Mazurek regarding historical questions regarding relationships in the ERS cases.	0.10	\$27.00
06/08/20	Shealeen E. Schaefer	212	Review remote deposition transcripts to confirm capture of objections, consistency, exhibits and proper formatting.	3.10	\$837.00
06/08/20	Lawrence T. Silvestro	212	Review remote deposition transcripts to confirm capture of objection formatting and consistency with exhibits and proper formatting (3.90); Confer with remote Court reporting agency regarding delivery and correction of amended exhibits (0.40).	4.30	\$1,161.00
06/08/20	Karina Pantoja	212	Organize ERS deposition exhibits (0.50).	0.50	\$135.00
06/09/20	Natasha Petrov	212	Compile pre-solicitation procedures related pleadings for B. Blackwell.	0.70	\$189.00
06/09/20	Shealeen E. Schaefer	212	Review remote deposition transcripts to confirm capture of objections, consistency, exhibits and proper formatting.	2.20	\$594.00
06/09/20	Shealeen E. Schaefer	212	Draft e-mail to W. Dalsen regarding results of targeted review of third-party productions.	0.30	\$81.00
06/09/20	Shealeen E. Schaefer	212	Review production history to identify certain production dates of various parties.	0.70	\$189.00
06/09/20	Shealeen E. Schaefer	212	Confer with C. Mazurek regarding production history and dates production of various parties.	0.10	\$27.00
06/09/20	Eric R. Chernus	212	Send newly received production to be loaded on an expedited basis with loading and foldering instructions (0.30).	0.30	\$81.00
06/09/20	Lawrence T. Silvestro	212	Review operative protective order governing designation of confidential testimony (0.40); Update remote deposition transcript exhibit files in internal database (1.20); Review remote deposition transcripts to confirm capture of objection formatting (1.10).	2.70	\$729.00
06/10/20	Shealeen E. Schaefer	212	Review and revise master production index to include additional information regarding productions.	1.70	\$459.00
06/10/20	Shealeen E. Schaefer	212	Review index of summary of ERS June 8 production.	0.30	\$81.00
06/10/20	Shealeen E. Schaefer	212	Review case database to verify incorporation of recent discovery materials.	1.10	\$297.00

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06/10/20	Lawrence T. Silvestro	212	Review remote deposition transcripts and associated exhibits to confirm capture of objection formatting (1.10).	1.10	\$297.00
06/10/20	Shealeen E. Schaefer	212	Draft index detailing collection of expert research materials.	2.80	\$756.00
06/10/20	Olaide M. Adejobi	212	Organize deposition transcripts per L. Silvestro.	0.20	\$54.00
06/11/20	Lawrence T. Silvestro	212	Review incoming deposition transcripts to identify exhibits cited in testimony (0.90); Review claimants' motion for judgment on the pleadings and provide cited authorities therein to W. Dalsen (1.10).	2.00	\$540.00
06/11/20	Eric R. Chernus	212	Send newly received production to vendor with loading and foldering instructions (0.40).	0.40	\$108.00
06/11/20	Shealeen E. Schaefer	212	Review research gathered regarding experts.	1.70	\$459.00
06/11/20	Shealeen E. Schaefer	212	Update deposition repository to incorporate deposition transcripts and exhibits.	1.30	\$351.00
06/12/20	Shealeen E. Schaefer	212	Review ERS bondholders' discovery correspondence.	0.30	\$81.00
06/12/20	Shealeen E. Schaefer	212	Review and index research gathered regarding experts.	2.10	\$567.00
06/12/20	Shealeen E. Schaefer	212	Update master production index to include additional information regarding productions.	1.20	\$324.00
06/12/20	Shealeen E. Schaefer	212	E-mail with R. Kim regarding expert research.	0.10	\$27.00
06/12/20	Lawrence T. Silvestro	212	Review incoming deposition transcripts to identify exhibits cited in testimony (0.90).	0.90	\$243.00
06/12/20	Shealeen E. Schaefer	212	Update case records to incorporate discovery materials and associated correspondence.	0.60	\$162.00
06/13/20	Shealeen E. Schaefer	212	Review and organize additional case and opinion research gathered regarding experts.	2.30	\$621.00
06/14/20	Shealeen E. Schaefer	212	Review O'Melveny's response to Jones Day's 6/12/2020 letter regarding discovery matters.	0.30	\$81.00
06/14/20	Shealeen E. Schaefer	212	Update production index to include additional information regarding discovery correspondence and privilege logs.	0.20	\$54.00
06/14/20	Shealeen E. Schaefer	212	Review Jones Day's 6/12/2020 letter regarding discovery matters.	0.20	\$54.00
06/14/20	Shealeen E. Schaefer	212	Update case databases to incorporate discovery materials and communications.	0.20	\$54.00
06/15/20	Shealeen E. Schaefer	212	Review discovery correspondence from bondholders.	0.30	\$81.00

Date	Timekeeper	Task	Description	Hours	Amount
06/15/20	Shealeen E. Schaefer	212	Review of cases and opinion research gathered regarding experts.	2.10	\$567.00
06/15/20	Shealeen E. Schaefer	212	Verify database loads of recent Bondholder production sets.	0.90	\$243.00
06/15/20	Shealeen E. Schaefer	212	Update case records to incorporate discovery materials and associated correspondence.	0.70	\$189.00
06/15/20	Shealeen E. Schaefer	212	Update production log.	0.40	\$108.00
06/15/20	Shealeen E. Schaefer	212	Review e-mails from Court reporter to verify receipt of recent deposition transcripts and associated exhibits.	0.70	\$189.00
06/15/20	Karina Pantoja	212	Update ERS deposition index (1.70).	1.70	\$459.00
06/15/20	Lawrence T. Silvestro	212	Review and identify misidentified deposition exhibits with remote Court reporting services and follow-up on delayed exhibits (1.80); Confer with said reporting service with issues exporting and importing electronic deposition files (0.30).	2.10	\$567.00
06/15/20	Eric R. Chernus	212	Check production overlay foldering and review document counts (0.40); Parse out bates numbers of overlaid records and create QC searches (0.50); Update case team with overlay status and effected folders (0.20).	1.10	\$297.00
06/16/20	Olaide M. Adejobi	212	Rename and organize Collazo Rodriguez and Soto deposition exhibits per L. Silvestro.	0.40	\$108.00
06/16/20	Lawrence T. Silvestro	212	Confer with Court reporting agency regarding deposition exhibits and management (0.40); Review exhibits against testimony to ensure conformity (0.90).	1.30	\$351.00
06/16/20	Shealeen E. Schaefer	212	Review non-party productions to identify certain bond materials.	1.20	\$324.00
06/16/20	Shealeen E. Schaefer	212	E-mail to W. Dalsen regarding certain documents identified in non-party productions.	0.10	\$27.00
06/16/20	Shealeen E. Schaefer	212	Update and organize case database to incorporate additional discovery materials.	1.10	\$297.00
06/16/20	Shealeen E. Schaefer	212	Review Skadden correspondence regarding claw back issue.	0.20	\$54.00
06/17/20	Shealeen E. Schaefer	212	Review production documents to identify key bond materials.	6.20	\$1,674.00
06/17/20	Shealeen E. Schaefer	212	[REDACTED: Work relating to court-ordered mediation].	0.20	\$54.00
06/17/20	Shealeen E. Schaefer	212	Review bondholders' correspondence regarding claw back.	0.20	\$54.00
06/17/20	Shealeen E. Schaefer	212	Update and organize case database to incorporate additional discovery materials.	0.60	\$162.00

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06/17/20	Eric R. Chernus	212	Send newly received production to vendor with loading and foldering instructions (0.30); Update production searches and discuss OCR issues with vendor (0.40); Discuss text searching options with case team and provide instructions to vendor for new OCR creation (0.70).	1.40	\$378.00
06/17/20	Shealeen E. Schaefer	212	Confer with C. Mazurek regarding document productions.	0.30	\$81.00
06/17/20	Olaide M. Adejobi	212	Review documents and identify which were used in prior depositions per S. Schaefer.	0.60	\$162.00
06/18/20	Olaide M. Adejobi	212	Compile and coordinate sending of claimants motion to dismiss and motion for allowance of administrative expense claims to M. Dale per L. Silvestro.	0.40	\$108.00
06/18/20	Olaide M. Adejobi	212	Quality-control and upload A. Chang deposition transcript and exhibits per L. Silvestro.	0.80	\$216.00
06/18/20	Shealeen E. Schaefer	212	Conference call with TSG Court reporters regarding remote depositions.	0.30	\$81.00
06/18/20	Shealeen E. Schaefer	212	Review deposition materials received from Court reporters to verify accuracy of transcripts and exhibits.	0.80	\$216.00
06/18/20	Lawrence T. Silvestro	212	Review deposition exhibits against testimony to ensure conformity (1.30); Confer with remote Court reporting agency to resolve mis-marked exhibits (0.90); Confer with new Court reporting agency to discuss customization of remote deposition platform (0.90).	3.10	\$837.00
06/19/20	Lawrence T. Silvestro	212	Review historical filings to identify certain legal authorities (0.90).	0.90	\$243.00
06/19/20	Tal J. Singer	212	Research regarding response filed in connection with motion to dismiss per M. Volin.	2.10	\$567.00
06/19/20	Shealeen E. Schaefer	212	Review historical filings in connection with identifying certain legal authorities.	0.90	\$243.00
06/19/20	Shealeen E. Schaefer	212	Review productions to identify certain materials cited in bondholders' discovery correspondence.	0.90	\$243.00
06/22/20	Tal J. Singer	212	Draft reply for administrative expense claims per J. Esses.	1.20	\$324.00
06/22/20	Lawrence T. Silvestro	212	Update video synced deposition files to format and import to internal repository (0.70); Review deposition exhibits against testimony to ensure conformity (0.90); Follow-up call with new Court reporting agency to discuss customization of remote deposition platform (0.70).	2.30	\$621.00

Date	Timekeeper	Task	Description	Hours	Amount
06/22/20	Shealeen E. Schaefer	212	E-mails with Court reporter regarding status of deposition transcripts and video files.	0.20	\$54.00
06/23/20	Shealeen E. Schaefer	212	Review case data to identify documents in support of motion for summary judgment.	2.40	\$648.00
06/23/20	Shealeen E. Schaefer	212	E-mails with attorneys regarding documents in support of motion for summary judgment.	0.40	\$108.00
06/23/20	Lawrence T. Silvestro	212	Update video synced deposition files to format and import to internal repository (0.90); Collect materials ahead of summary judgment preparation (1.20).	2.10	\$567.00
06/23/20	Eric R. Chernus	212	Send new received production to vendor with loading instructions (0.30).	0.30	\$81.00
06/23/20	Olaide M. Adejobi	212	Upload and organize exhibit files for various depositions per L. Silvestro.	1.40	\$378.00
06/24/20	Lawrence T. Silvestro	212	Update video synced deposition files to format and import to internal repository (0.90); Collect materials ahead of summary judgment preparation (1.20).	2.10	\$567.00
06/24/20	Shealeen E. Schaefer	212	Review case data to identify key documents including specific bond materials.	2.60	\$702.00
06/24/20	Shealeen E. Schaefer	212	Review remote deposition transcripts to confirm exhibits and proper formatting.	1.40	\$378.00
06/25/20	Lawrence T. Silvestro	212	Confer with R. Kim regarding co-counsel access to deposition repository (0.10); Index and cross-check deposition files and exhibits (1.10); Confer with remote deposition vendor regarding updated remote platform specifications (0.30).	1.50	\$405.00
06/25/20	Shealeen E. Schaefer	212	Update production index to include hyperlinks to data sets and additional information regarding discovery correspondence.	0.40	\$108.00
06/25/20	Shealeen E. Schaefer	212	Review e-mail from C. Mazurek detailing ERS litigation and discovery history.	0.40	\$108.00
06/26/20	Shealeen E. Schaefer	212	Identify materials in connection with expert reports.	3.40	\$918.00
06/26/20	Shealeen E. Schaefer	212	Update case databases to incorporate correspondence and key documents.	1.10	\$297.00
06/26/20	Shealeen E. Schaefer	212	Review stipulation and binding the ERS bondholders to the Confidentiality Agreement.	0.20	\$54.00
06/26/20	Eric R. Chernus	212	Send new received production to vendor with loading and foldering instructions (0.40).	0.40	\$108.00
06/26/20	Lawrence T. Silvestro	212	Research caselaw in summary judgment draft and draft tables of authorities (1.10); Retrieve all cited legal authorities in said draft (2.40).	3.50	\$945.00

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Date	Timekeeper	Task	Description	Hours	Amount
06/29/20	Shealeen E. Schaefer	212	Update master production index to include additional information regarding productions and document details.	1.80	\$486.00
06/29/20	Shealeen E. Schaefer	212	Update case databases to incorporate discovery documents and correspondence.	0.20	\$54.00
06/30/20	Shealeen E. Schaefer	212	Review case records and production documents to identify key documents including bond materials.	4.70	\$1,269.00
06/30/20	Shealeen E. Schaefer	212	Download production set received from O'Melveny for processing the discovery platform.	0.20	\$54.00
06/30/20	Shealeen E. Schaefer	212	Update production log to incorporate details regarding recent production sets.	0.20	\$54.00
06/30/20	Eric R. Chernus	212	Send new received production to vendor with loading and foldering instructions (0.30).	0.30	\$81.00
06/30/20	Dennis T. Mcpeck	212	Compile all cases cited to in draft Rule 12(c) opposition brief.	5.00	\$1,350.00
06/30/20	Tal J. Singer	212	Research regarding SCC, AAFAF and Ultra Vires issue per J. Esses and R. Kim.	0.30	\$81.00
General Administration				152.70	\$41,229.00

Plan of Adjustment and Disclosure Statement -- 215

Date	Timekeeper	Task	Description	Hours	Amount
06/17/20	Brooke H. Blackwell	215	E-mail with Targem regarding translations of ERS solicitation notices (0.10); E-mail with S. Ma and L. Stafford regarding same (0.10); Finalize drafts for publication (0.40); E-mail with E. Carino regarding review of Spanish drafts (0.20); E-mail final notices to Prime Clerk for publication (0.10).	0.90	\$710.10
Plan of Adjustment and Disclosure Statement				0.90	\$710.10

Employment and Fee Applications -- 218

Date	Timekeeper	Task	Description	Hours	Amount
06/04/20	Tal J. Singer	218	Review Title III docket and fee narratives in connection with drafting interim fee application.	0.90	\$243.00
06/08/20	Natasha Petrov	218	Review of Proskauer monthly statements, case dockets, and pleadings for Proskauer 9th interim fee application (1.10); Draft same (0.60).	1.70	\$459.00

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Date	Timekeeper	Task	Description	Hours	Amount
06/22/20	Natasha Petrov	218	Continue drafting Proskauer 9th interim fee application.	1.40	\$378.00
06/24/20	Natasha Petrov	218	Analyze data from Finance Department for Proskauer 9th interim fee application.	0.60	\$162.00
06/25/20	Natasha Petrov	218	Continue drafting 9th interim fee application.	0.70	\$189.00
06/26/20	Natasha Petrov	218	Analyze May monthly statement for 9th interim fee application (1.20); Draft same (3.60).	4.80	\$1,296.00
Employment and Fee Applications				10.10	\$2,727.00
Total for Professional Services					\$1,111,473.00

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Timekeeper Summary

Timekeeper	Status	Hours	Rate	Value
BRIAN S. ROSEN	PARTNER	11.10	789.00	\$8,757.90
CARLOS E. MARTINEZ	PARTNER	2.60	789.00	\$2,051.40
CHANTEL L. FEBUS	PARTNER	21.30	789.00	\$16,805.70
EHUD BARAK	PARTNER	50.20	789.00	\$39,607.80
JEFFREY W. LEVITAN	PARTNER	145.30	789.00	\$114,641.70
JONATHAN E. RICHMAN	PARTNER	6.20	789.00	\$4,891.80
KEVIN J. PERRA	PARTNER	0.50	789.00	\$394.50
LARY ALAN RAPPAPORT	PARTNER	0.20	789.00	\$157.80
MARGARET A. DALE	PARTNER	113.80	789.00	\$89,788.20
MARK HARRIS	PARTNER	1.60	789.00	\$1,262.40
MICHAEL A. FIRESTEIN	PARTNER	0.50	789.00	\$394.50
MICHAEL R. HACKETT	PARTNER	6.80	789.00	\$5,365.20
PAUL POSSINGER	PARTNER	1.80	789.00	\$1,420.20
STEVEN O. WEISE	PARTNER	141.10	789.00	\$111,327.90
TIMOTHY W. MUNGOVAN	PARTNER	0.50	789.00	\$394.50
Total for PARTNER		503.50		\$397,261.50
JENNIFER L. ROCHE	SENIOR COUNSEL	94.70	789.00	\$74,718.30
Total for SENIOR COUNSEL		94.70		\$74,718.30
ADAM L. DEMING	ASSOCIATE	41.70	789.00	\$32,901.30
BROOKE C. GOTTLIEB	ASSOCIATE	2.90	789.00	\$2,288.10
BROOKE H. BLACKWELL	ASSOCIATE	4.20	789.00	\$3,313.80
CARL MAZUREK	ASSOCIATE	61.30	789.00	\$48,365.70
ELISA CARINO	ASSOCIATE	54.20	789.00	\$42,763.80
ELLIOT STEVENS	ASSOCIATE	5.60	789.00	\$4,418.40
HENA VORA	ASSOCIATE	13.20	789.00	\$10,414.80
JOSHUA A. ESSES	ASSOCIATE	35.40	789.00	\$27,930.60
KELLY M. CURTIS	ASSOCIATE	26.00	789.00	\$20,514.00
LAURA STAFFORD	ASSOCIATE	5.20	789.00	\$4,102.80
MATTHEW A. SKRZYNSKI	ASSOCIATE	25.20	789.00	\$19,882.80
MEE R. KIM	ASSOCIATE	233.40	789.00	\$184,152.60
MEGAN R. VOLIN	ASSOCIATE	41.20	789.00	\$32,506.80
RUSSELL T. GORKIN	ASSOCIATE	13.70	789.00	\$10,809.30
WILLIAM D. DALSEN	ASSOCIATE	191.60	789.00	\$151,172.40
Total for ASSOCIATE		754.80		\$595,537.20
DENNIS T. MCPECK	LEGAL ASSISTANT	5.00	270.00	\$1,350.00
KARINA PANTOJA	LEGAL ASSISTANT	11.00	270.00	\$2,970.00
LAWRENCE T. SILVESTRO	LEGAL ASSISTANT	43.70	270.00	\$11,799.00
NATASHA PETROV	LEGAL ASSISTANT	9.90	270.00	\$2,673.00
OLAIDE M. ADEJOBI	LEGAL ASSISTANT	4.50	270.00	\$1,215.00
SHEALEEN E. SCHAEFER	LEGAL ASSISTANT	78.70	270.00	\$21,249.00
TAL J. SINGER	LEGAL ASSISTANT	4.50	270.00	\$1,215.00
Total for LEGAL ASSISTANT		157.30		\$42,471.00
ERIC R. CHERNUS	PRAC. SUPPORT	5.50	270.00	\$1,485.00
Total for PRAC. SUPPORT		5.50		\$1,485.00
Total		1,515.80		\$1,111,473.00

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For Charges and Disbursements

Date	Timekeeper	Type	Description	Amount
06/11/2020	Tal J. Singer	REPRODUCTION	REPRODUCTION	\$17.40
06/18/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$0.30
06/18/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$13.60
06/18/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$2.50
06/18/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$1.10
06/18/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$7.20
06/20/2020	Jonathan E. Richman	REPRODUCTION	REPRODUCTION	\$10.10
06/20/2020	Jonathan E. Richman	REPRODUCTION	REPRODUCTION	\$13.40
06/20/2020	Jonathan E. Richman	REPRODUCTION	REPRODUCTION	\$4.60
06/20/2020	Jonathan E. Richman	REPRODUCTION	REPRODUCTION	\$1.90
06/22/2020	Jonathan E. Richman	REPRODUCTION	REPRODUCTION	\$2.60
Total for REPRODUCTION				\$74.70

Date	Timekeeper	Type	Description	Amount
06/08/2020	Jennifer L. Roche	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$198.00
06/14/2020	Brooke C. Gottlieb	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$99.00
06/18/2020	Carl Mazurek	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$297.00
06/22/2020	Ehud Barak	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$396.00
06/24/2020	Jennifer L. Roche	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$574.00
06/24/2020	William D. Dalsen	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$544.00
06/24/2020	Adam L. Deming	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$647.00
06/25/2020	William D. Dalsen	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$346.00
06/25/2020	Adam L. Deming	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Shepards and Autocite - 0 Lexsees and Lexstat - 0 Searches - 0	\$99.00
06/26/2020	Adam L. Deming	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$891.00

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Date	Timekeeper	Type	Description	Amount
06/29/2020	Ehud Barak	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$99.00
06/30/2020	Ehud Barak	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$693.00
06/30/2020	William D. Dalsen	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$99.00
Total for LEXIS				\$4,982.00

Date	Timekeeper	Type	Description	Amount
06/02/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 7 Lines Printed	\$366.00
06/03/2020	Elisa Carino	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 15 Lines Printed	\$143.00
06/05/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 5 Lines Printed	\$143.00
06/08/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 25 Lines Printed	\$1,430.00
06/10/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 4 Lines Printed	\$143.00
06/11/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 4 Lines Printed	\$143.00
06/12/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 5 Lines Printed	\$143.00
06/13/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 6 Lines Printed	\$265.00
06/15/2020	Joshua A. Esses	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 16 Lines Printed	\$858.00
06/17/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 9 Lines Printed	\$143.00
06/18/2020	Carl Mazurek	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 9 Lines Printed	\$575.00
06/18/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 5 Lines Printed	\$286.00
06/19/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 13 Lines Printed	\$244.00
06/20/2020	Elisa Carino	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 31 Lines Printed	\$387.00

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Date	Timekeeper	Type	Description	Amount
06/20/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 17 Lines Printed	\$43.00
06/20/2020	Elisa Carino	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 85 Lines Printed	\$143.00
06/21/2020	Elisa Carino	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 92 Lines Printed	\$1,175.00
06/22/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 27 Lines Printed	\$1,001.00
06/23/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 62 Lines Printed	\$1,060.00
06/24/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 18 Lines Printed	\$143.00
06/24/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 8 Lines Printed	\$572.00
06/25/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 18 Lines Printed	\$1,060.00
06/26/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 5 Lines Printed	\$286.00
06/26/2020	Kelly M. Curtis	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 58 Lines Printed	\$4,004.00
06/27/2020	Kelly M. Curtis	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 20 Lines Printed	\$286.00
06/27/2020	Elisa Carino	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 79 Lines Printed	\$429.00
06/27/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 3 Lines Printed	\$143.00
			Total for WESTLAW	\$15,614.00

Date	Timekeeper	Type	Description	Amount
02/21/2020	Mark Harris	FILING AND COURT COSTS	FILING AND COURT COSTS - - VENDOR: COUNSEL PRESS LLC Case Name: Andalusian Global Designated v. FOMB; INV:0009109579; 2/21/2020	\$1,307.59
02/21/2020	Mark Harris	FILING AND COURT COSTS	FILING AND COURT COSTS - - VENDOR: COUNSEL PRESS LLC COUNSEL PRESS LLC;Case Name: Andalusian Global Designated v. FOMB; SUPPLEMENTAL APPENDIX; INV:0009109578; 2/21/2020	\$6,443.55

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**Total for FILING AND COURT
COSTS \$7,751.14**

Date	Timekeeper	Type	Description	Amount
06/17/2020	Martin J. Bienenstock	TRANSCRIPTS & DEPOSITIONS	TRANSCRIPTS & DEPOSITIONS - - VENDOR: GREGORY EDWARDS LLC inv# 118666 6/17/20 Certified original transcript - GE Virtual Deposition	\$2,961.12
06/17/2020	Martin J. Bienenstock	TRANSCRIPTS & DEPOSITIONS	TRANSCRIPTS & DEPOSITIONS - - VENDOR: GREGORY EDWARDS LLC inv# 118661 6/17/20 Video Services - GE Disposition	\$1,110.00
06/17/2020	Martin J. Bienenstock	TRANSCRIPTS & DEPOSITIONS	TRANSCRIPTS & DEPOSITIONS - - VENDOR: GREGORY EDWARDS LLC inv# 118659 6/17/20 Certified original transcript of R. Engman	\$3,228.37
06/17/2020	Martin J. Bienenstock	TRANSCRIPTS & DEPOSITIONS	TRANSCRIPTS & DEPOSITIONS - - VENDOR: GREGORY EDWARDS LLC inv# 118667 6/17/20 Video Services GE Virtual Deposition	\$955.00
Total for TRANSCRIPTS & DEPOSITIONS				\$8,254.49

Date	Timekeeper	Type	Description	Amount
04/22/2020	Ralph C. Ferrara	TELEPHONE	TELEPHONE Telephone/Long Distance/Roaming - Ralph Ferrara Telephonically participate in hearing before Judge Swain	\$70.00
Total for TELEPHONE				\$70.00

Date	Timekeeper	Type	Description	Amount
05/11/2020	Martin J. Bienenstock	PRACTICE SUPPORT VENDORS	PRACTICE SUPPORT VENDORS- - VENDOR: LD LOWER HOLIDNGS INC KL DISCOVERY ONTRACK - INVOICE P0100118859-DISCOVERY SERVICES/Active Hosting - Relativity/User Access - Relativity- 04/01/20- 04/30/20	\$3,124.10
06/08/2020	Martin J. Bienenstock	PRACTICE SUPPORT VENDORS	PRACTICE SUPPORT VENDORS - - VENDOR: LD LOWER HOLIDNGS INC KL DISCOVERY ONTRACK - INVOICE - P0100124744- DISCOVERY SERVICES	\$2,944.40
Total for PRACTICE SUPPORT VENDORS				\$6,068.50

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Date	Timekeeper	Type	Description	Amount
02/20/2020	Joshua A. Esses	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 02/28/2020 2002282938 Catering for: 9359 - Esses, Joshua Booked On: 02/18/2020;Event Date:02/20/2020 Office: New York - 11XS; Room(s): 2802 CM# 33260.0007	\$18.51
02/20/2020	Joshua A. Esses	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 02/28/2020 2002282938 Catering for: 9359 - Esses, Joshua Booked On: 02/12/2020;Event Date:02/20/2020 Office: New York - 11XS; Room(s): 2810 CM# 33260.0007	\$69.41
02/20/2020	Joshua A. Esses	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 02/28/2020 2002282938 Catering for: 9359 - Esses, Joshua Booked On: 02/12/2020;Event Date:02/20/2020 Office: New York - 11XS; Room(s): 2810 CM# 33260.0007	\$714.49
02/28/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 06/10/2020 200610279 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:02/28/2020 Office: New York - 11XS; Room(s): 2842 CM# 33260.0007	\$55.53
02/28/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 06/10/2020 200610279 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:02/28/2020 Office: New York - 11XS; Room(s): 2834 CM# 33260.0007	\$329.89
02/28/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 06/10/2020 200610279 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:02/28/2020 Office: New York - 11XS; Room(s): 2842 CM# 33260.0007	\$75.12
03/03/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 06/10/2020 200610279 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:03/03/2020 Office: New York - 11XS; Room(s): 2100 B CM# 33260.0007	\$329.89

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Date	Timekeeper	Type	Description	Amount
03/03/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 06/10/2020 200610279 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:03/03/2020 Office: New York - 11XS; Room(s): 2100 A CM# 33260.0007	\$55.53
03/04/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 06/10/2020 200610279 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:03/04/2020 Office: New York - 11XS; Room(s): 2800 A CM# 33260.0007	\$75.12
03/04/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 06/10/2020 200610279 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:03/04/2020 Office: New York - 11XS; Room(s): 2826 CM# 33260.0007	\$329.89
03/05/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 06/10/2020 200610279 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:03/05/2020 Office: New York - 11XS; Room(s): 2804 CM# 33260.0007	\$55.53
03/05/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 06/10/2020 200610279 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:03/05/2020 Office: New York - 11XS; Room(s): 2826 CM# 33260.0007	\$329.89
03/06/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 03/20/2020 2003205690 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:03/06/2020 Office: New York - 11XS; Room(s): 2842 CM# 33260.0007	\$55.53
03/06/2020	Lawrence T. Silvestro	FOOD SERVICE/CONF. DINING	FOOD SERVICE/CONF. DINING Meals Invoice Date 03/20/2020 2003205690 Catering for: 1422 - Silvestro, Lawrence T. Booked On: 02/20/2020;Event Date:03/06/2020 Office: New York - 11XS; Room(s): 2826 CM# 33260.0007	\$329.89
Total for FOOD SERVICE/CONF. DINING				\$2,824.22

Charges and Disbursements Summary

33260 FOMB

Invoice 190155022

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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Type of Disbursements	Amount
REPRODUCTION	74.70
LEXIS	4,982.00
WESTLAW	15,614.00
FILING AND COURT COSTS	7,751.14
TRANSCRIPTS & DEPOSITIONS	8,254.49
TELEPHONE	70.00
PRACTICE SUPPORT VENDORS	6,068.50
FOOD SERVICE/CONF. DINING	2,824.22
Total Expenses	\$45,639.05
Total Amount for this Matter	\$1,157,112.05

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

-----X

In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

-----X

IN RE:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3566-LTS

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO,

Debtor.

-----X

**COVER SHEET TO FORTIETH MONTHLY FEE APPLICATION OF PROSKAUER
ROSE LLP AS ATTORNEYS TO THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, AS REPRESENTATIVE OF DEBTOR, EMPLOYEES
RETIREMENT SYSTEM ("ERS")
FOR THE PERIOD JULY 1, 2020 THROUGH JULY 31, 2020**

Name of Applicant:

Proskauer Rose LLP ("Proskauer")

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Authorized to Provide
Professional Services to:

Financial Oversight and Management Board, as
Representative for the Debtor Pursuant to
PROMESA Section 315(b)

Period for which compensation
and reimbursement for fees and services
is sought:

July 1, 2020 through July 31, 2020

Amount of compensation sought
as actual, reasonable and necessary:

\$849,611.40

Amount of expense reimbursement sought
as actual, reasonable and necessary:

\$12,417.60

Total Amount for these Invoices:

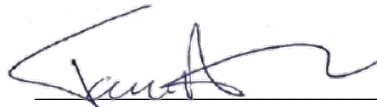
\$862,029.00

This is a: X monthly ___ interim ___ final application.

This is Proskauer's 40th monthly fee application in these cases.

Principal Certification

I hereby authorize the submission of this Monthly Fee Statement for July 2020.

A handwritten signature in dark ink, appearing to read 'Jaime A. El Koury', is positioned above a horizontal line.

Jaime A. El Koury
General Counsel to the Financial Oversight and
Management Board for Puerto Rico

On August 21, 2020 sent to:

FOMB:

Financial Oversight and Management Board
40 Washington Square South
Office 314A
New York, NY 10012
Attn: Professor Arthur J. Gonzalez
FOMB Board Member

O'Neill & Borges LLC
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Office of United States Trustee

Office of the United States Trustee for the District of
Puerto Rico
Edificio Ochoa, 500 Tanca Street, Suite 301
San Juan, PR 00901
(In re: Commonwealth of Puerto Rico)

Office of the United States Trustee for Region 21
75 Spring Street, SW, Room 362
Atlanta, GA 30303
Attn: Guy G. Gebhardt
Acting United States Trustee (Region 21)
(In re: Commonwealth of Puerto Rico)

**Co-Counsel for the Official Committee of Unsecured
Creditors:**

Paul Hastings LLP
200 Park Avenue
New York, NY 10166
Attn: Luc. A. Despins, Esq.

Casillas, Santiago & Torres, LLC
El Caribe Office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901-2419
Attn: Juan J. Casillas Ayala, Esq.
Alberto J. E. Añeses Negrón, Esq.

Co-Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, WI 53703
Attn: Katherine Stadler

EDGE Legal Strategies, PSC
252 Ponce de León Avenue
Citibank Tower, 12th Floor
San Juan, PR 00918
Attn: Eyck O. Lugo

Co-Counsel for AAFAF:

O'Melveny & Myers LLP,
Times Square Tower
7 Times Square
New York, NY 10036
Attn: John J. Rapisardi, Esq.
Suzanne Uhland, Esq.
Diana M. Perez, Esq.

Marini Pietrantonio Muñiz LLC
MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero, Esq.

Co-Counsel for the Official Committee of Retirees:

Jenner & Block LLP
919 Third Avenue
New York, NY 10022-3908
Attn.: Robert Gordon, Esq.
Richard Levin, Esq.

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn.: Catherine Steege, Esq.
Melissa Root, Esq.

Bennazar, García & Milián, C.S.P.
Edificio Union Plaza, PH-A
416 Avenida Ponce de León
Hato Rey, PR 00918
Attn.: A.J. Bennazar-Zequeira, Esq.

Puerto Rico Department of Treasury

PO Box 9024140
San Juan, PR 00902-4140
Attn: Reylam Guerra Goderich, Deputy Assistant of
Central Accounting
Omar E. Rodríguez Pérez, CPA, Assistant
Secretary of Central Accounting
Angel L. Pantoja Rodríguez, Deputy Assistant of
Internal Revenue and Tax Policy
Francisco Parés Alicea, Assistant Secretary of
Internal Revenue and Tax Policy
Francisco Peña Montañez, CPA, Assistant
Secretary of the Treasury

Summary of Legal Fees for the Period July 2020

ERS – General			
Task Code	Matter Description	Total Billed Hours	Total Fees Requested
202	Legal Research	11.40	\$8,994.60
204	Communications with Claimholders	1.70	\$1,341.30
205	Communications with the Commonwealth and its Representatives of the Commonwealth or its Instrumentalities	2.30	\$1,814.70
206	Documents Filed on Behalf of the Board	368.20	\$290,509.80
207	Non-Board Court Filings	2.70	\$2,130.30
210	Analysis and Strategy	553.70	\$436,869.30
212	General Administration	382.00	\$103,140.00
218	Employment and Fee Applications	7.30	\$1,971.00
Total		1,329.30	\$846,771.00

ERS – Miscellaneous			
Task Code	Matter Description	Total Billed Hours	Total Fees Requested
219	Appeal	3.60	\$2,840.40
Total		3.60	\$2,840.40

Summary of Legal Fees for the Period July 2020

ACROSS ALL ERS-RELATED MATTERS

Professional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Brian S. Rosen	Partner	BSGR & B	\$789.00	4.00	\$3,156.00
Chantel L. Febus	Partner	Litigation	\$789.00	37.30	\$29,429.70
Ehud Barak	Partner	BSGR & B	\$789.00	44.40	\$35,031.60
Jeffrey W. Levitan	Partner	BSGR & B	\$789.00	117.00	\$92,313.00
Kevin J. Perra	Partner	Litigation	\$789.00	1.50	\$1,183.50
Lary Alan Rappaport	Partner	Litigation	\$789.00	0.50	\$394.50
Margaret A. Dale	Partner	Litigation	\$789.00	59.30	\$46,787.70
Mark Harris	Partner	Litigation	\$789.00	11.40	\$8,994.60
Martin J. Bienenstock	Partner	BSGR & B	\$789.00	33.30	\$26,273.70
Michael A. Firestein	Partner	Litigation	\$789.00	0.10	\$78.90
Michael R. Hackett	Partner	Litigation	\$789.00	2.60	\$2,051.40
Steven O. Weise	Partner	Corporate	\$789.00	182.60	\$144,071.40
Timothy W. Mungovan	Partner	Litigation	\$789.00	1.10	\$867.90
Jennifer L. Roche	Senior Counsel	Litigation	\$789.00	61.20	\$48,286.80
Adam L. Deming	Associate	Litigation	\$789.00	16.50	\$13,018.50
Ariella Muller	Associate	Litigation	\$789.00	5.20	\$4,102.80
Elisa Carino	Associate	Litigation	\$789.00	16.40	\$12,939.60
Elliot Stevens	Associate	BSGR & B	\$789.00	0.50	\$394.50
Joshua A. Esses	Associate	BSGR & B	\$789.00	75.20	\$59,332.80
Kelly M. Curtis	Associate	Litigation	\$789.00	21.30	\$16,805.70
Laura Stafford	Associate	Litigation	\$789.00	0.50	\$394.50
Matthew A. Skrzynski	Associate	BSGR & B	\$789.00	17.30	\$13,649.70
Mee R. Kim	Associate	Litigation	\$789.00	141.80	\$111,880.20
Megan R. Volin	Associate	Corporate	\$789.00	11.30	\$8,915.70
Russell T. Gorkin	Associate	Litigation	\$789.00	10.80	\$8,521.20
William D. Dalsen	Associate	Litigation	\$789.00	70.50	\$55,624.50

Summary of Legal Fees for the Period July 2020

Professional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
TOTAL				943.60	\$744,500.40

Paraprofessional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Angelo Monforte	Legal Assistant	Litigation	\$270.00	1.80	\$486.00
Charles H. King	Legal Assistant	Litigation	\$270.00	3.50	\$945.00
Dennis T. Mcpeck	Legal Assistant	Litigation	\$270.00	11.10	\$2,997.00
Eric R. Chernus	Practice Support	Professional Resources	\$270.00	12.40	\$3,348.00
Joan K. Hoffman	Legal Assistant	Litigation	\$270.00	92.70	\$25,029.00
Julia L. Sutherland	Legal Assistant	Litigation	\$270.00	19.80	\$5,346.00
Laura M. Geary	Legal Assistant	Litigation	\$270.00	24.70	\$6,669.00
Lawrence T. Silvestro	Legal Assistant	Litigation	\$270.00	73.20	\$19,764.00
Lela Lerner	Legal Assistant	Litigation	\$270.00	5.00	\$1,350.00
Natasha Petrov	Legal Assistant	BSGR & B	\$270.00	7.30	\$1,971.00
Olaide M. Adejobi	Legal Assistant	Litigation	\$270.00	18.60	\$5,022.00
Shealeen E. Schaefer	Legal Assistant	Labor & Employment	\$270.00	117.30	\$31,671.00
Tal J. Singer	Legal Assistant	Litigation	\$270.00	1.90	\$513.00
TOTAL				389.30	\$105,111.00

SUMMARY OF LEGAL FEES	<u>Hours</u> 1,332.90	<u>Fees</u> \$849,611.40
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Summary of Disbursements for the period July 2020

ACROSS ALL ERS-RELATED MATTERS

EXPENSE CATEGORY	AMOUNTS
Data Base Search Serv.	\$20.00
Highq Licensing	\$370.00
Lexis	\$1,388.00
Out Of Town Meals	\$80.00
Reproduction	\$299.60
Westlaw	\$10,260.00
Total	\$12,417.60

Proskauer requests payment of fees and reimbursement of expenses in accordance with the procedures set forth in the Interim Compensation Order (*i.e.*, payment of ninety percent (90%) of the compensation sought, in the amount of \$764,650.26 and reimbursement of one-hundred percent (100%) of expenses incurred, in the amount of \$12,417.60) in the total amount of \$777,067.86.

Professional Certification

I hereby certify that no public servant of the Department of Treasury is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the authorized representatives of the Financial Oversight and Management Board for Puerto Rico. The amount of this invoice is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, Proskauer Rose LLP does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900

Exhibit A

33260 FOMB

Invoice 190157962

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD
MEMBER

0007 PROMESA TITLE III: ERS

Page 1

Summary of Time Billed by Task		Hours	Value
202	Legal Research	11.40	\$8,994.60
204	Communications with Claimholders	1.70	\$1,341.30
205	Communications with the Commonwealth and its Representatives	2.30	\$1,814.70
206	Documents Filed on Behalf of the Board	368.20	\$290,509.80
207	Non-Board Court Filings	2.70	\$2,130.30
210	Analysis and Strategy	553.70	\$436,869.30
212	General Administration	382.00	\$103,140.00
218	Employment and Fee Applications	7.30	\$1,971.00
Total		1,329.30	\$846,771.00

33260 FOMB

Invoice 190157962

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

Page 2

Legal Research -- 202

Date	Timekeeper	Task	Description	Hours	Amount
07/08/20	Megan R. Volin	202	E-mails with T. Singer regarding 12(b) research (0.10); Review final 12(c) response (0.40).	0.50	\$394.50
07/08/20	Matthew A. Skrzynski	202	Conduct research in support of drafting section of 12(b) motion with administrative expenses.	0.80	\$631.20
07/09/20	Kelly M. Curtis	202	Revise contracts clause section of draft ERS reply per M. Harris edits, including additional legal research.	2.90	\$2,288.10
07/09/20	Megan R. Volin	202	Research standard of review for 12(b) reply.	3.20	\$2,524.80
07/11/20	Megan R. Volin	202	Call with J. Levitan regarding research for 12(b) reply (0.10); Research for 12(b) reply (3.90).	4.00	\$3,156.00
Legal Research				11.40	\$8,994.60

Communications with Claimholders -- 204

Date	Timekeeper	Task	Description	Hours	Amount
07/10/20	William D. Dalsen	204	Call with opposing counsel regarding scheduling matters (0.30); Correspondence with committees and AAFAF regarding scheduling matters (0.30); Review Hildreth expert report (1.10).	1.70	\$1,341.30
Communications with Claimholders				1.70	\$1,341.30

Communications with the Commonwealth and its Representatives -- 205

Date	Timekeeper	Task	Description	Hours	Amount
07/02/20	Ehud Barak	205	Call with O'Melveny coordinating ERS 12(b) and 12(c) response.	1.10	\$867.90
07/02/20	Adam L. Deming	205	Prepare for call (0.10); Call with O'Melveny regarding ERS post-petition legislation reply in support of motion to dismiss (1.10).	1.20	\$946.80
Communications with the Commonwealth and its Representatives				2.30	\$1,814.70

Documents Filed on Behalf of the Board -- 206

Date	Timekeeper	Task	Description	Hours	Amount
07/01/20	William D. Dalsen	206	Revise draft opposition to Rule 12(c) motion (4.80).	4.80	\$3,787.20

33260 FOMB

Invoice 190157962

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

Page 3

Date	Timekeeper	Task	Description	Hours	Amount
07/01/20	Jeffrey W. Levitan	206	Review revisions to expert report (0.90); E-mails and teleconferences M. Dale regarding expert report (0.50); E-mails with M. Dale regarding employer contributions (0.20); Review revised drafts of 12(c) response and draft outline of comments and issues (3.30); E-mails with S. Weise and team regarding revisions to 12(c) response (0.50); Teleconference E. Barak regarding 12(c) response (0.30); E-mails with N. Bassett, M. Bienenstock regarding 12(c) motion (0.30); Review Act 106 provisions, e-mail J. Esses regarding same (0.20).	6.20	\$4,891.80
07/01/20	Joshua A. Esses	206	Draft reply in support of motion to dismiss.	7.60	\$5,996.40
07/01/20	Chantel L. Febus	206	Revise ERS reply brief draft Contracts Clause section.	2.20	\$1,735.80
07/01/20	Chantel L. Febus	206	Revise ERS reply brief draft Takings Clause section and cases cited in section.	2.90	\$2,288.10
07/01/20	Ehud Barak	206	Review and revise the 12(b) outline (2.60); Review and revise 12(c) outline (2.40); Confer with J. Levitan regarding same (0.30).	5.30	\$4,181.70
07/02/20	Chantel L. Febus	206	Review ERS reply brief constitutional law sections.	1.90	\$1,499.10
07/02/20	Kelly M. Curtis	206	Confer with R. Gorkin, A. Deming, and M. Harris regarding ERS reply (0.80); Confer with W. Dalsen, R. Gorkin, A. Deming, M. Harris, M. Dale, P. Friedman, E. Barak, M. DiConza, E. McDowell, M. Dreebun, B. Sushon, M. Pocha, J. Levitan, R. Holm regarding ERS Rule 12 motions (1.10); Revise Contracts Clause section of draft ERS reply brief (3.10).	5.00	\$3,945.00
07/02/20	Martin J. Bienenstock	206	Review ERS bondholders' 12(c) motion (1.10); Review and revisions of opposition to 12(c) motion (5.70).	6.80	\$5,365.20
07/02/20	Joshua A. Esses	206	Call and e-mails with J. Levitan on 12(b) response (0.40); Call with O'Melveny on 12(b) response (1.10); Draft reply in support of motion to dismiss claims (4.60).	6.10	\$4,812.90
07/03/20	Joshua A. Esses	206	Draft reply in support of motion to dismiss.	0.70	\$552.30
07/06/20	Steven O. Weise	206	Review and revise 12(c) brief.	4.20	\$3,313.80
07/06/20	Megan R. Volin	206	Review M. Bienenstock comments to 12(c) response (0.30); E-mails with J. Esses regarding 1111(b) section of 12(c) response (0.10); Revise 1111(b) section of 12(c) response (0.90).	1.30	\$1,025.70

33260 FOMB

Invoice 190157962

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

Page 4

Date	Timekeeper	Task	Description	Hours	Amount
07/06/20	Jeffrey W. Levitan	206	E-mails with M. Bienenstock, M. Harris regarding Rule 12 motions (0.10); E-mails with J. Esses regarding Rule 12 motions (0.50); Teleconference M. Dale regarding Rule 12 motions (0.20); Review bondholders 2019 statement, e-mails B. Rosen regarding same, strategy (0.40); Teleconference E. Barak regarding Rule 12 motions (0.40); Analyze Bondholders' 12(b) response, cases cited (1.60); Review comments to 12(c) response (0.80); E-mails M. Bienenstock, W. Dalsen regarding revisions to 12(c) response (0.40); Edit 12(c) response (2.90).	7.30	\$5,759.70
07/06/20	Martin J. Bienenstock	206	Review and revise opposition to ERS bondholders 12(c) motion asserting claims against ERS and Commonwealth.	9.40	\$7,416.60
07/06/20	Matthew A. Skrzynski	206	Draft portion of 12(b) response motion regarding administrative expenses.	0.30	\$236.70
07/06/20	Joshua A. Esses	206	Draft ERS section 12(b) reply.	7.40	\$5,838.60
07/06/20	Chantel L. Febus	206	Revise ERS reply brief constitutional law sections (8.80); Call with A. Deming regarding same (0.60).	9.40	\$7,416.60
07/06/20	Adam L. Deming	206	Rewrite and revise Takings Clause section of reply to tighten, streamline, and clarify various portions at C. Febus' direction (3.60); Conduct additional research regarding underlying decisions and First Circuit Takings jurisprudence (1.60).	5.20	\$4,102.80
07/06/20	Adam L. Deming	206	Review draft taking section for reply in support of motion to dismiss with revisions and additions from R. Gorkin.	0.50	\$394.50
07/06/20	Ehud Barak	206	Call with J. Levitan regarding 12(b) and 12(c) motions (0.40); Review M. Bienenstock comments (0.80).	1.20	\$946.80
07/06/20	Adam L. Deming	206	Prepare for call with C. Febus (0.30); Call with C. Febus regarding rewrites to Takings section of ERS reply (0.60).	0.90	\$710.10
07/06/20	William D. Dalsen	206	Revise draft opposition to Rule 12(c) motion for judgment on the pleadings (0.80).	0.80	\$631.20
07/06/20	Kelly M. Curtis	206	Revise ERS reply brief regarding the contracts clause.	2.30	\$1,814.70
07/07/20	Russell T. Gorkin	206	Review and revise constitutional law sections of reply brief.	1.00	\$789.00
07/07/20	Adam L. Deming	206	Revise Takings Clause section of reply at C. Febus' direction.	0.90	\$710.10
07/07/20	Ehud Barak	206	Call with J. Levitan regarding ERS pleadings (0.20); Review and revise the 12(c) opposition (3.30).	3.50	\$2,761.50

33260 FOMB

Invoice 190157962

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

Page 5

Date	Timekeeper	Task	Description	Hours	Amount
07/07/20	William D. Dalsen	206	Revise draft opposition to Rule 12(c) motion (6.30).	6.30	\$4,970.70
07/07/20	Chantel L. Febus	206	Revise ERS reply brief constitutional law sections in advance of M. Harris review.	2.80	\$2,209.20
07/07/20	Margaret A. Dale	206	Review revisions to Rule 12(c) opposition (0.80); Review and revise Rule 12(c) opposition (2.20); E-mails with J. Levitan, S. Weise and W. Dalsen regarding edits to Rule 12(c) opposition (0.50).	3.50	\$2,761.50
07/07/20	Steven O. Weise	206	Review and revise 12(c) brief.	7.30	\$5,759.70
07/07/20	Jennifer L. Roche	206	Review draft opposition to motion for judgment on the pleadings (0.50); E-mails with M. Dale, S. Weise and S. Weise regarding same (0.20); Review deposition transcripts in connection with lien scope summary judgment motion (1.30).	2.00	\$1,578.00
07/07/20	Matthew A. Skrzynski	206	Draft portion of 12(b) response motion regarding administrative expenses.	3.10	\$2,445.90
07/07/20	Matthew A. Skrzynski	206	Revise portion of 12(c) response based on J. Levitan and M. Bienenstock comments.	1.80	\$1,420.20
07/07/20	Joshua A. Esses	206	Call with J. Levitan on ERS reply (0.40); Draft reply in support of motion to dismiss claims (6.10).	6.50	\$5,128.50
07/07/20	Megan R. Volin	206	Review revised draft 12(c) response (0.20); E-mails with J. Esses regarding 12(b) research (0.10).	0.30	\$236.70
07/07/20	Jeffrey W. Levitan	206	Teleconference J. Esses regarding 12(b) reply (0.40); Review comments to 12(c) response (0.70); Review M. Pocha e-mails, R. Kim e-mail, teleconference J. Esses regarding January stipulation (0.50); Teleconference and e-mails with E. Barak, M. Dale regarding Rule 12 motions (0.40); E-mails W. Dalsen and team regarding 12(c) response (0.30); Revise 12(c) response (3.10).	5.40	\$4,260.60
07/08/20	Matthew A. Skrzynski	206	Draft portion of 12(b) response motion regarding administrative expenses.	6.40	\$5,049.60
07/08/20	Steven O. Weise	206	Review and revise 12(c) brief.	5.40	\$4,260.60

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Date	Timekeeper	Task	Description	Hours	Amount
07/08/20	Jeffrey W. Levitan	206	Analysis of comments to 12(c) response (1.10); Teleconference W. Dalsen regarding revisions to response (0.80); Teleconference J. Esses regarding 1111(b), revise insert (0.40); Review revised 12(c) response (1.60); E-mails W. Dalsen, S. Weise regarding revisions to 12(c) response (0.50); Review bondholder proposal, e-mails R. Kim, M. Dale regarding schedule (0.50); Teleconference E. Barak regarding Rule 12 motions (0.30).	5.20	\$4,102.80
07/08/20	Elisa Carino	206	Draft joint motion and accompanying proposed order to modify scheduling deadlines to assist M. Dale.	1.70	\$1,341.30
07/08/20	Chantel L. Febus	206	Revise ERS reply brief constitutional law sections (4.70); Communications with R. Gorkin regarding same (0.80); Communications with M. Harris regarding same (0.40).	5.90	\$4,655.10
07/08/20	Chantel L. Febus	206	Review M. Harris edits to ERS reply brief constitutional law sections in advance of call.	0.80	\$631.20
07/08/20	Mark Harris	206	Review and revise draft reply constitutional sections (3.20); Call with C. Febus, A. Deming, R. Gorkin, and K. Curtis regarding same (0.80).	4.00	\$3,156.00
07/08/20	Adam L. Deming	206	Revise footnote of Takings clause section in ERS reply clarifying arguments per R. Gorkin (0.30); Review revisions introduced by R. Gorkin and provide further input (0.20).	0.50	\$394.50
07/08/20	Kelly M. Curtis	206	Revise Contract Clause section of ERS reply brief per conference with M. Harris.	4.90	\$3,866.10
07/08/20	Adam L. Deming	206	Review revisions from M. Harris to Takings section of ERS reply brief (0.50); Confer with M. Harris, C. Febus, R. Gorkin, and K. Curtis regarding revisions to contracts and taking sections of ERS reply brief (0.80).	1.30	\$1,025.70
07/08/20	Adam L. Deming	206	Incorporate comments from M. Harris to Takings section of ERS reply.	1.10	\$867.90
07/08/20	Ehud Barak	206	Review and revise the 12(c) opposition (2.40); Call with J. Levitan regarding same (0.30); Conduct research regarding 12(b) motion (3.60).	6.30	\$4,970.70
07/08/20	Joshua A. Esses	206	Draft 12(b) reply in support of motion to dismiss claims (6.10); Confer with J. Levitan regarding same (0.40).	6.50	\$5,128.50
07/08/20	Kelly M. Curtis	206	Confer with M. Harris regarding edits to ERS reply brief (0.80).	0.80	\$631.20

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Date	Timekeeper	Task	Description	Hours	Amount
07/08/20	Timothy W. Mungovan	206	Review opposition of Retiree committee to ERS bondholders and Fiscal Agent's motion for judgment on pleadings in connection with administrative expense claims (0.20).	0.20	\$157.80
07/08/20	Timothy W. Mungovan	206	Review opposition of Board to ERS bondholders and Fiscal Agent's motion for judgment on pleadings in connection with administrative expense claims (0.10).	0.10	\$78.90
07/08/20	William D. Dalsen	206	Revise draft opposition to Rule 12(c) motion (6.10); Confer with J. Levitan regarding same (0.80).	6.90	\$5,444.10
07/09/20	Russell T. Gorkin	206	Review and edit ERS constitutional arguments for reply brief (1.60); E-mail correspondence with M. Harris, C. Febus, K. Curtis and A. Deming regarding same (0.30).	1.90	\$1,499.10
07/09/20	Adam L. Deming	206	Review and revise Takings portion of draft reply in accordance with M. Harris's second round of feedback.	2.60	\$2,051.40
07/09/20	Chantel L. Febus	206	Revise ERS reply brief constitutional law sections in advance of J. Levitan review.	5.20	\$4,102.80
07/09/20	Mark Harris	206	Revise conditional law sections of reply brief.	1.40	\$1,104.60
07/09/20	Matthew A. Skrzynski	206	Draft portion of 12(b) response motion regarding administrative expenses.	2.20	\$1,735.80
07/09/20	Joshua A. Esses	206	Draft Rule 12(b) reply in support of motion to dismiss (6.90); Confer with J. Levitan regarding same (0.30).	7.20	\$5,680.80
07/10/20	Joshua A. Esses	206	Draft Rule 12(b) reply in support of motion to dismiss.	0.20	\$157.80
07/10/20	Jennifer L. Roche	206	Draft motion summary judgment on lien scope issues (2.30); E-mails with W. Dalsen and M. Dale regarding discovery and scheduling issues (0.10); E-mails with expert regarding potential rebuttal report (0.20).	2.60	\$2,051.40
07/10/20	Megan R. Volin	206	E-mails with J. Levitan regarding cases cited in 12(b) reply.	0.20	\$157.80
07/11/20	Jeffrey W. Levitan	206	Review and revise 12(b) reply (9.50); Confer with M. Volin regarding same (0.10).	9.60	\$7,574.40
07/11/20	Ehud Barak	206	Review and revise the 12(b) drat (3.60); Conduct research regarding same (2.20).	5.80	\$4,576.20
07/12/20	Ehud Barak	206	Review and revise the 12(b) draft (2.80); Discuss with J. Levitan (0.40).	3.20	\$2,524.80
07/12/20	William D. Dalsen	206	Revise draft joint motion to modify schedule in lien-scope/ultra-vires and claims/administrative expense proceedings.	1.20	\$946.80

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Date	Timekeeper	Task	Description	Hours	Amount
07/12/20	Joshua A. Esses	206	Draft reply in support of ERS motion to dismiss claims.	1.30	\$1,025.70
07/12/20	Jeffrey W. Levitan	206	Revise 12(b) reply.	9.30	\$7,337.70
07/12/20	Megan R. Volin	206	Review and incorporate J. Levitan comments to 12(b) reply (1.70); E-mails with J. Levitan and J. Esses regarding 12(b) reply (0.10).	1.80	\$1,420.20
07/13/20	Jeffrey W. Levitan	206	Review e-mails regarding schedule, e-mails J. Esses, M. Dale and teleconference M. Dale regarding reply (0.50); Teleconference E. Barak regarding reply (0.30); Teleconferences J. Esses regarding reply (0.50); Edit reply (5.80).	7.10	\$5,601.90
07/13/20	Lary Alan Rappaport	206	Review joint urgent motion regarding deadlines for ERS special claims committee litigation (0.10).	0.10	\$78.90
07/13/20	Joshua A. Esses	206	Draft reply in support of motion of dismiss.	6.10	\$4,812.90
07/13/20	Adam L. Deming	206	Review full draft reply, including revisions to Takings and Contracts sections, in ERS post-petition legislation adversary proceeding.	1.10	\$867.90
07/13/20	William D. Dalsen	206	Review draft reply in support of Rule 12(b) motion to dismiss claims and administrative expense motions (1.40).	1.40	\$1,104.60
07/13/20	Elliot Stevens	206	Draft edits to ERS response (0.40); E-mail same to E. Barak (0.10).	0.50	\$394.50
07/13/20	Kelly M. Curtis	206	Implement edits to Contracts Clause section of ERS reply brief per comments provided by M. Dale, including additional legal research.	3.60	\$2,840.40
07/13/20	Ehud Barak	206	Call with J. Levitan regarding 12(b) brief (0.30).	0.30	\$236.70
07/13/20	Ehud Barak	206	Review and revise the 12(b) reply.	3.80	\$2,998.20
07/14/20	Adam L. Deming	206	Review comments to ERS reply brief from S. Weise.	0.40	\$315.60
07/14/20	Ehud Barak	206	Review and revise the 12(b) reply (3.80); Conduct relevant research (3.40).	7.20	\$5,680.80
07/14/20	Kelly M. Curtis	206	Revise Takings Clause section of ERS reply brief per comments made by M. Dale.	1.80	\$1,420.20
07/14/20	William D. Dalsen	206	Review revised draft reply in support of Rule 12(b) motion to dismiss claims and administrative expense motions.	1.70	\$1,341.30
07/14/20	Joshua A. Esses	206	Draft reply in support of motion to dismiss.	6.20	\$4,891.80

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Date	Timekeeper	Task	Description	Hours	Amount
07/14/20	Jeffrey W. Levitan	206	Review comments to 12(b) reply (1.40); Teleconferences and e-mails J. Esses regarding revisions (0.50); Teleconference E. Barak regarding 12(b) reply (0.70); Review Nortel decision (0.30); E-mails S. Weise regarding reply (0.30); Revise 12(b) reply (3.90); Review draft expert rebuttal report (1.20).	8.30	\$6,548.70
07/14/20	Lary Alan Rappaport	206	Review joint motion revising deadlines for bond adversary proceedings by Special Claims Committee, Judge Swain Order on joint urgent motion (0.20).	0.20	\$157.80
07/14/20	Laura Stafford	206	E-mails with B. Blackwell, et al. regarding PBA and ERS reminder notice (0.10).	0.10	\$78.90
07/15/20	Laura Stafford	206	Review and revise bar date notice and publication notice.	0.30	\$236.70
07/15/20	Joshua A. Esses	206	Draft reply in support of motion to dismiss.	3.60	\$2,840.40
07/15/20	Elisa Carino	206	Draft motion for leave to file overlength reply.	1.80	\$1,420.20
07/15/20	William D. Dalsen	206	Review revised draft reply in support of Rule 12(b) motion to dismiss claims and administrative expense motion (1.50).	1.50	\$1,183.50
07/15/20	Elisa Carino	206	Review and revise Spanish-language notices of extension to assist L. Stafford.	0.20	\$157.80
07/15/20	Ehud Barak	206	Review and revise the 12(b) reply (2.40); Conduct relevant research (2.30).	4.70	\$3,708.30
07/15/20	Ehud Barak	206	Call with J. Levitan regarding Bondholders' 12(c) motion (0.30).	0.30	\$236.70
07/15/20	Martin J. Bienenstock	206	Review, edit, draft portions, and research reply to opposition of ERS bondholders to motion to dismiss and disallow claims.	6.30	\$4,970.70
07/16/20	Elisa Carino	206	Revise motion to exceed page limits to assist J. Esses.	0.60	\$473.40
07/16/20	Ariella Muller	206	Review Board motion to dismiss in preparation of Board summary judgment motion.	0.60	\$473.40
07/17/20	Ehud Barak	206	Review and revise the 12(b) brief.	1.40	\$1,104.60
07/20/20	Jeffrey W. Levitan	206	Review comments to rebuttal expert report (0.60); E-mails with E. Barak and team regarding 12(b) reply (0.50); E-mail M. Bienenstock regarding 12(b) (0.10); Review comments to 12(b) reply (0.90).	2.10	\$1,656.90
07/20/20	Elisa Carino	206	Revise motion to exceed page limits to assist W. Dalsen.	0.20	\$157.80

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Date	Timekeeper	Task	Description	Hours	Amount
07/20/20	Martin J. Bienenstock	206	Review, revise, draft portions of, and research opposition to ERS bondholders' administrative and fifth amendment claims against Commonwealth.	6.60	\$5,207.40
07/20/20	William D. Dalsen	206	Revise draft consent urgent motion to exceed reply page limit for Rule 12(b) motion to dismiss claims and administrative expense motion (0.30).	0.30	\$236.70
07/20/20	Joshua A. Esses	206	Draft ERS reply in support motion to dismiss claims.	0.30	\$236.70
07/20/20	Chantel L. Febus	206	Review M. Bienenstock's edits to ERS reply brief.	0.70	\$552.30
07/21/20	Joshua A. Esses	206	Draft reply in support of claims motion to dismiss.	7.30	\$5,759.70
07/21/20	William D. Dalsen	206	Review revised draft reply in support of Rule 12(b) motion to dismiss claims and administrative expense motions (0.20).	0.20	\$157.80
07/21/20	Martin J. Bienenstock	206	Review latest draft of opposition to ERS bondholders' claims and edited and draft some new sections.	4.20	\$3,313.80
07/21/20	Jeffrey W. Levitan	206	Review revised 12(b) reply (0.90); Teleconference E. Barak regarding 12(b) reply (0.20); E-mails with J. Esses regarding 12(b) reply (0.30).	1.40	\$1,104.60
07/22/20	Joshua A. Esses	206	Finalize and file reply in support of motion to dismiss.	3.40	\$2,682.60
07/29/20	Joshua A. Esses	206	Review analysis of lien-scope arguments (0.20); Call with J. Roche and group on lien-scope arguments (1.40).	1.60	\$1,262.40
07/30/20	Joshua A. Esses	206	Call with K. Perra and J. Levitan regarding Court of federal claims bondholders' pleading.	0.80	\$631.20
07/30/20	Jennifer L. Roche	206	E-mail with W. Dalsen regarding Bondholders expected certiorari petition (0.10); Draft lien scope summary judgment motion (3.50).	3.60	\$2,840.40
07/30/20	Elisa Carino	206	Update citations in draft statement of material facts to assist J. Roche.	1.40	\$1,104.60
07/31/20	Jennifer L. Roche	206	E-mails with W. Dalsen regarding certiorari petition (0.10); Analysis and drafting of lien scope summary judgment brief (5.00).	5.10	\$4,023.90
Documents Filed on Behalf of the Board				368.20	\$290,509.80

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Non-Board Court Filings -- 207

Date	Timekeeper	Task	Description	Hours	Amount
07/06/20	Brian S. Rosen	207	Review ERS bondholders disclosure (0.30); Draft memorandum to M. Dale regarding same (0.10); Review J. Levitan memorandum regarding same (0.10); Draft memorandum to J. Levitan regarding same (0.10).	0.60	\$473.40
07/08/20	Michael A. Firestein	207	Review limited UCC joinder in 12(c) opposition (0.10).	0.10	\$78.90
07/27/20	Timothy W. Mungovan	207	E-mails with K. Perra regarding ERS bondholders motion for leave to amend their taking clause complaint (0.20).	0.20	\$157.80
07/30/20	William D. Dalsen	207	Review ERS Bondholders' motion to amend complaint in Court of Federal Claims action (0.70); Call with J. Levitan and K. Perra regarding Court of Federal Claims case (0.70); Correspondence with M. Harris regarding anticipated petition for certiorari from 552 decision (0.40).	1.80	\$1,420.20
Non-Board Court Filings				2.70	\$2,130.30

Analysis and Strategy -- 210

Date	Timekeeper	Task	Description	Hours	Amount
07/01/20	Jennifer L. Roche	210	Review and comments on lien tracing report (1.20); E-mails with R. Kim regarding same (0.20); E-mails with expert and Committee counsel regarding ultra vires report (0.10); E-mails with R. Kim and W. Dalsen regarding expert work product (0.20); Review proposed edits to opposition to motion for judgment on the pleadings (0.40).	2.10	\$1,656.90
07/01/20	Russell T. Gorkin	210	Correspondence with C. Febus regarding reply brief related to motion to dismiss Takings and Contract Clause claims.	0.10	\$78.90
07/01/20	Steven O. Weise	210	Review issues regarding recourse claims for breach of covenants.	4.20	\$3,313.80
07/01/20	Steven O. Weise	210	Review issues regarding tracing of collateral (1.10); Review revised expert report (2.20).	3.30	\$2,603.70

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Date	Timekeeper	Task	Description	Hours	Amount
07/01/20	Margaret A. Dale	210	Review and revisions to finalize Hinton expert report on tracing (4.80); Teleconferences with R. Kim regarding finalizing Hinton report (0.50); E-mails with R. Kim, W. Dalsen and J. Roche regarding issues related to finalizing Hinton expert report (0.50); E-mails with W. Dalsen and R. Kim regarding exchange of expert discovery materials (0.20); Teleconference with J. Levitan regarding finalizing expert report (0.20); Conference call with Brattle and R. Kim to finalize report (0.50); Review and revise draft of Rule 12(c) opposition (2.20).	8.90	\$7,022.10
07/01/20	Mee R. Kim	210	E-mails with M. Dale, Proskauer team and Brattle team regarding draft expert report (1.70); E-mails with Brattle team regarding same (1.20); E-mails with M. Dale, Proskauer team, and common interest counsel regarding same (0.80); Review same draft (9.30); E-mails with M. Dale regarding same (0.40); E-mails with M. Dale and Proskauer team regarding same (3.10); Conferences with M. Dale regarding same (0.50); E-mails with M. Dale regarding same (0.30); Teleconference with Brattle team regarding same (0.60); Teleconference with M. Dale and Brattle team regarding same (0.50); E-mails with J. Roche regarding same (0.30); Review bondholders' expert reports (0.20); E-mails with W. Dalsen, Proskauer team and Brattle team regarding same (0.20).	19.10	\$15,069.90
07/01/20	William D. Dalsen	210	Correspondence with Committees and Government Parties regarding expert reports to be served today (0.30); Draft correspondence to ERS Bondholders regarding exchange of expert materials (0.30); Review final expert reports (1.80).	2.40	\$1,893.60
07/01/20	Laura Stafford	210	E-mails with J. Berman and E. Carino regarding PBA and ERS radio ads (0.10).	0.10	\$78.90

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Date	Timekeeper	Task	Description	Hours	Amount
07/02/20	Jeffrey W. Levitan	210	Review provision, teleconference J. Esses regarding Act 106 (0.30); E-mail with W. Dalsen regarding expert report (0.10); Teleconference M. Dale regarding briefing schedules, e-mails S. Weise regarding set off issues (0.50); Analyze bondholders tracing expert report (1.40); Review bondholders' 12(b)response to prepare for call (0.60); Teleconference P. Friedman and O'Melveny team regarding Rule 12 motions (1.10); Participate in call (partial) with P. Hinton and team regarding rebuttal report (1.40).	5.40	\$4,260.60
07/02/20	Jennifer L. Roche	210	E-mails with R. Kim and W. Dalsen regarding expert reports and production (0.20); E-mail with Committee counsel regarding expert reports (0.10).	0.30	\$236.70
07/02/20	William D. Dalsen	210	Review ERS Bondholder expert reports (2.10); Call with counsel to AAFAF regarding claims and administration expense motions (1.10); [REDACTED: Work relating to court-ordered mediation] (0.50).	3.70	\$2,919.30
07/02/20	Adam L. Deming	210	Confer with M. Harris, R. Gorkin, and K. Curtis regarding Takings and Contracts arguments in post-petition legislation action.	0.80	\$631.20
07/02/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding bondholders' tracing expert report and Rule 12 motions (0.20); E-mails with O'Melveny, L. Stafford and W. Dalsen regarding reproducing cash analysis Rule 2004 discovery to Jones Day (0.20); Conference call with O'Melveny and Proskauer to discuss Rule 12 motions and opposition/reply (partial) (0.70); E-mails related to litigation schedule and proposed changes to same (0.20); Initial read of expert report of Argiz regarding tracing issues (1.00); Conference call (partial) with Brattle, S. Weise, J. Levitan, and R. Kim regarding Argiz expert report (1.00).	3.30	\$2,603.70

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Date	Timekeeper	Task	Description	Hours	Amount
07/02/20	Mee R. Kim	210	E-mails with W. Dalsen and Proskauer team regarding expert report work papers (0.80); E-mails with Brattle team regarding same (0.60); Review information regarding same (0.20); E-mails with W. Dalsen and Proskauer team regarding expert reports (0.40); E-mails with M. Dale regarding same (0.10); E-mails with Brattle team regarding same (0.20); Videoconference with M. Dale, J. Levitan, S. Weise and Brattle team regarding same (1.80).	4.10	\$3,234.90
07/02/20	Matthew A. Skrzynski	210	Correspond with J. Levitan regarding drafting response to 12(b) motion regarding administrative expense issues.	0.10	\$78.90
07/02/20	Steven O. Weise	210	Review issues regarding tracing of collateral and bondholders expert's report (1.90); Conference with Brattle, M. Dale, J. Levitan, and R. Kim regarding same (1.80).	3.70	\$2,919.30
07/02/20	Steven O. Weise	210	Review issues regarding recourse claims for breach of covenants.	1.00	\$789.00
07/02/20	Russell T. Gorkin	210	Call with M. Harris, K. Curtis and A. Deming regarding Contact and Takings Clause reply brief (0.80); Prepare for same (0.50); Call with O'Melveny and Proskauer teams regarding same (1.10); Review and analyze case law related to Contracts Clause reply brief, and review and revise same (2.50).	4.90	\$3,866.10
07/02/20	Elisa Carino	210	Analyze deadlines and orders to assist M. Dale with scheduling strategy for ultra vires and lien scope proceedings.	0.60	\$473.40
07/02/20	Mark Harris	210	Teleconference regarding reply on jurisdictional issues with R. Gorkin, K. Curtis, and A. Deming (0.80); Teleconference with O'Melveny team regarding same (1.00).	1.80	\$1,420.20
07/03/20	Steven O. Weise	210	Review issues regarding tracing of collateral and bondholders expert's report.	3.80	\$2,998.20
07/03/20	Matthew A. Skrzynski	210	Correspond with J. Levitan regarding draft response to 12(b) motion regarding administrative expense issue.	0.20	\$157.80

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Date	Timekeeper	Task	Description	Hours	Amount
07/03/20	Margaret A. Dale	210	Conference call with N. Bassett, J. Levitan and W. Dalsen regarding Rule 12(c) opposition (0.30); E-mails with W. Dalsen and R. Kim regarding exchange of expert work papers (0.20); Prepare and revise proposals for schedules regarding lien scope/ultra vires and admin expense (1.00); E-mails with W. Dalsen and J. Roche regarding proposed schedule changes (0.20); Teleconference with J. Levitan regarding proposals for schedules regarding lien scope/ultra vires and admin expense (0.20); E-mails with litigation and restructuring teams regarding proposals for schedules regarding lien scope/ultra vires and admin expense (0.30).	2.20	\$1,735.80
07/03/20	Mee R. Kim	210	E-mails with W. Dalsen and Proskauer team regarding expert report work papers (0.20); E-mails with W. Dalsen, common interest counsel, and bondholder counsel regarding same (0.10); E-mails with M. Dale and W. Dalsen regarding same (0.10); E-mails with Brattle team regarding same (0.10); E-mails with M. Dale and Proskauer team regarding proposed schedule (0.50); E-mails with Brattle team regarding same (0.20).	1.20	\$946.80
07/03/20	William D. Dalsen	210	Call with counsel to UCC regarding Rule 12(c) opposition briefing (0.30); Correspondence with opposing counsel regarding production of expert work papers (0.20); Correspondence with Committees and AAFAF regarding schedule in ERS proceedings (0.20).	0.70	\$552.30
07/03/20	Jennifer L. Roche	210	Analysis regarding proposed revision to schedule (0.20); E-mails with M. Dale and W. Dalsen regarding schedule (0.10).	0.30	\$236.70
07/03/20	Jeffrey W. Levitan	210	Prepare for call (0.10); Teleconference with N. Bassett regarding 12(c) response (0.30); Review Hildreth expert report (0.80); Review e-mails regarding discovery (0.10); Review Spanish-language expert report (0.30); Teleconference and e-mails with E. Barak, M. Skrzynski regarding 12(b) response (0.50); Review proposed litigation schedule, e-mails M. Dale regarding same (0.40); Teleconference M. Dale regarding schedule (0.20).	2.70	\$2,130.30

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Date	Timekeeper	Task	Description	Hours	Amount
07/04/20	Steven O. Weise	210	Review issues regarding bondholders expert's report.	1.80	\$1,420.20
07/04/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	2.40	\$1,893.60
07/04/20	Mee R. Kim	210	E-mails with Brattle team regarding draft rebuttal expert report (0.10); E-mails with M. Dale regarding same (0.10).	0.20	\$157.80
07/05/20	Mee R. Kim	210	E-mails with M. Dale and W. Dalsen regarding expert report strategy.	0.10	\$78.90
07/05/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	3.60	\$2,840.40
07/05/20	Steven O. Weise	210	Review issues regarding bondholders expert's report.	2.70	\$2,130.30
07/06/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	2.70	\$2,130.30
07/06/20	Steven O. Weise	210	Review issues regarding bondholders expert's report.	3.70	\$2,919.30
07/06/20	Jennifer L. Roche	210	E-mails with Committee counsel and expert regarding ultra vires report (0.10); Review Bondholder correspondence regarding proposed litigation schedule (0.10); Review and analyze bondholder expert reports (2.50); Conference with M. Dale and ERS litigation team regarding case status and strategy (0.50).	3.20	\$2,524.80
07/06/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding schedule issues (0.20); Weekly meeting with litigation team regarding to-dos and updates (0.50); Teleconference with W. Dalsen regarding e-mail to bondholders regarding schedule (0.10); Review M. Bienenstock comments to Rule 12(c) opposition (0.80); E-mails with J. Levitan and W. Dalsen regarding implementing edits to brief and page limit (0.20).	1.80	\$1,420.20
07/06/20	Elisa Carino	210	Phone call regarding status of litigation with M. Dale, J. Roche, R. Kim and W. Dalsen.	0.50	\$394.50
07/06/20	Mee R. Kim	210	Teleconference with M. Dale, J. Roche, W. Dalsen and E. Carino regarding litigation strategy (0.50); E-mails with M. Dale and Proskauer team regarding same (0.60).	1.10	\$867.90

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Date	Timekeeper	Task	Description	Hours	Amount
07/06/20	William D. Dalsen	210	Call with M. Dale and J. Roche regarding ERS case status (0.50); Analyze Gonzalez expert report (1.30); Review Argiz expert report (2.10); Correspondence with opposing counsel regarding proposed schedule changes to lien-scope/ultra vires and claims/administrative expense schedules (0.30).	4.20	\$3,313.80
07/07/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding litigation strategy (0.90); E-mails with M. Dale and Board advisors regarding same (0.10); E-mails with M. Dale and team and O'Melveny team regarding same (0.20).	1.20	\$946.80
07/07/20	Mark Harris	210	Review ERS opening brief and opposition constitutional law sections.	2.50	\$1,972.50
07/07/20	William D. Dalsen	210	Analysis of Rule 12(b) reply arguments (0.70); Correspondence with J. Esses regarding Rule 12(b) reply arguments (0.30).	1.00	\$789.00
07/07/20	Matthew A. Skrzynski	210	Review background documents in support of draft response to 12(b) motion.	1.40	\$1,104.60
07/07/20	Steven O. Weise	210	Review issues regarding bondholders expert's report.	2.90	\$2,288.10
07/07/20	Lary Alan Rappaport	210	E-mails with E. Barak, J. Esses, D. Desatnik regarding providing J. Esses with prior briefing on issue relevant to ERS (0.20).	0.20	\$157.80
07/08/20	Margaret A. Dale	210	Review revised draft of Rule 12(c) opposition brief (1.00); Teleconference with J. Levitan regarding schedule (0.20); E-mails with W. Dalsen, J. Levitan and S. Weise regarding finalizing Rule 12(c) opposition (0.50); E-mails with W. Dalsen and J. Roche regarding rebuttal expert reports (0.20); Review summary of bondholder expert report regarding municipal finance (0.50); Communications with Constitutional team regarding Rule 12(b) reply brief (0.20); E-mails with bondholders regarding proposed changes to schedules on lien scope/ultra vires and admin expense (0.40); Communications with J. Levitan, W. Dalsen and R. Kim regarding proposed changes to schedules on lien scope/ultra vires (0.30).	3.30	\$2,603.70
07/08/20	Chantel L. Febus	210	Call with M. Harris, R. Gorkin, A. Deming and K. Curtis regarding edits to ERS reply brief constitutional law sections.	0.80	\$631.20

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Date	Timekeeper	Task	Description	Hours	Amount
07/08/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding litigation strategy (0.80); E-mails with M. Dale and Board advisors regarding same (0.20); E-mails with Brattle team regarding same (0.50); Videoconference with Brattle team regarding same (0.80); E-mail with A. Mohan regarding same (0.10); Teleconference with Brattle team regarding same (0.10).	2.50	\$1,972.50
07/08/20	Russell T. Gorkin	210	Call with M. Harris, C. Febus, K. Curtis and A. Deming regarding reply to ERS opposition to motion to dismiss contracts and takings clause claims (0.80); Review, edit and revise same (1.50).	2.30	\$1,814.70
07/08/20	William D. Dalsen	210	Review joinder to opposition to motion for judgment on the pleadings by UCC (0.20); Review opposition to motion for judgment on the pleadings by Retiree Committee (0.30); Correspondence with J. Levitan regarding common-interest filings pertaining to motion for judgment on the pleadings (0.20).	0.70	\$552.30
07/08/20	Matthew A. Skrzynski	210	Review background documents in support of draft response to 12(b) motion.	1.00	\$789.00
07/08/20	Jennifer L. Roche	210	Conference with expert regarding Bondholders' expert report (1.00); Analysis regarding potential rebuttal topics (0.60); E-mails with Committee counsel regarding potential rebuttal (0.20); E-mails with W. Dalsen, R. Kim and M. Dale regarding expert depositions and scheduling issues (0.20).	2.00	\$1,578.00
07/09/20	William D. Dalsen	210	Call with E. Carino, J. Roche, S. Schaefer, and L. Silvestro regarding preparation for summary judgment motion (0.40); Correspondence with ERS Bondholders regarding expert discovery issues (0.30); Correspondence with J. Esses regarding reply in support of motion to dismiss claims and administrative expense motions (0.10); Correspondence with Committees and AAFAF regarding proposed modification to lien-scope and ultra-vires schedule (0.10); Analyze Hildredth expert report (2.30).	3.20	\$2,524.80

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Date	Timekeeper	Task	Description	Hours	Amount
07/09/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding litigation strategy (0.40); E-mails with M. Dale and Brattle team regarding same (0.20); Review Argiz expert report regarding same (4.20); E-mails with Brattle team regarding same (0.10); Draft memorandum regarding same (6.30).	11.20	\$8,836.80
07/09/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	5.20	\$4,102.80
07/09/20	Jeffrey W. Levitan	210	Review W. Dalsen e-mails regarding 12(c) (0.10); Review Committee joinder, e-mail R. Kim regarding experts (0.40); E-mail W. Dalsen regarding schedule (0.10); Review recent decision addressing certain precedent (0.40); Compare expert reports on receivables (0.50); E-mails with M. Pachu regarding receivables (0.50); E-mails with P. Friedman regarding Act 106 (3.00); Teleconference J. Esses regarding 12(b) reply (0.30); Review Constitutional section of reply (0.60); E-mail C. Febus regarding 12(b) reply (0.10); Review outline of rebuttal report, e-mail M. Dale regarding same (0.50).	6.50	\$5,128.50
07/09/20	Margaret A. Dale	210	E-mails with W. Dalsen regarding litigation schedules and outreach to bondholders regarding same (0.30); E-mails with R. Kim and W. Dalsen regarding rebuttal expert reports and deposition timing (0.30); Review outline for Hinton rebuttal (0.60); E-mails with R. Kim and J. Levitan regarding Hinton rebuttal (0.10); E-mails with W. Dalsen regarding Hildreth report and additional documents we need (0.20).	1.50	\$1,183.50

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Date	Timekeeper	Task	Description	Hours	Amount
07/09/20	Jennifer L. Roche	210	Conference with S. Schaeffer and W. Dalsen and E. Carino regarding motion for summary judgment planning (0.40); Analysis regarding bondholders' expert report (2.40); E-mails with W. Dalsen, R. Kim and M. Dale regarding expert depositions (0.20); E-mails with W. Dalsen regarding expert disclosure (0.10); E-mail with Bondholders regarding expert disclosure (0.10); E-mails with expert regarding bondholders' report and potential rebuttal (0.20); E-mails with Committee and AAFAF counsel regarding scheduling issues (0.10); Analysis regarding lien scope summary judgment issues (1.20).	4.70	\$3,708.30
07/09/20	Elisa Carino	210	Conference with J. Roche, W. Dalsen, S. Schaeffer and L. Silvestro regarding motion for summary judgment tasks and strategy.	0.40	\$315.60
07/10/20	Jeffrey W. Levitan	210	Review summary of Argiz report (0.40); Analyze draft chart for rebuttal report (0.20); Participate in call (partial) with P. Hinton and team regarding rebuttal report (1.60); Teleconference and e-mails M. Dale, E. Barak, M. Volin regarding schedule, 12(b) response (0.50); Review and revise 12(b) reply (5.40).	8.10	\$6,390.90
07/10/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding litigation strategy (0.20); E-mails with Proskauer team and Brattle team regarding same (0.10); Videoconference with M. Dale, J. Levitan and Brattle team regarding same (2.00); E-mails with Brattle team regarding same (0.40); Review documents regarding same (4.20).	6.90	\$5,444.10
07/10/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	3.30	\$2,603.70
07/10/20	Margaret A. Dale	210	Conference call with Brattle, J. Levitan, and R. Kim regarding rebuttal report (2.00); Communications with R. Kim and W. Dalsen regarding timing of Hinton and Argiz depositions and call with M. Papez regarding same (0.20).	2.20	\$1,735.80
07/11/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	4.70	\$3,708.30
07/11/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	3.20	\$2,524.80

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Date	Timekeeper	Task	Description	Hours	Amount
07/11/20	Mee R. Kim	210	E-mail with P. Hinton and Brattle team regarding litigation strategy (0.10).	0.10	\$78.90
07/11/20	Jennifer L. Roche	210	E-mails with W. Dalsen, Committee counsel and expert regarding rebuttal report (0.20); Review material from expert (0.30).	0.50	\$394.50
07/12/20	Margaret A. Dale	210	Review draft joint motion to modify the schedules in admin expense proceeding and lien scope/ultra vires proceeding (0.30).	0.30	\$236.70
07/12/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	3.70	\$2,919.30
07/12/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	1.40	\$1,104.60
07/13/20	Jennifer L. Roche	210	Analysis regarding draft rebuttal report on ultra vires issues (2.40); Conference with M. Dale and ERS litigation team regarding case strategy and status (0.40); Review and revise draft reply in support of motion to dismiss admin expense claim motion (2.00); E-mails with Bondholder counsel regarding motion to extend schedule (0.10); E-mails with S. Weise and M. Dale regarding reply brief (0.10).	5.00	\$3,945.00
07/13/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	2.80	\$2,209.20
07/13/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	4.60	\$3,629.40
07/13/20	Steven O. Weise	210	Review issues regarding motion to dismiss (12(d) motion).	3.50	\$2,761.50
07/13/20	Elisa Carino	210	Phone call regarding status of litigation with M. Dale, J. Roche, and W. Dalsen.	0.40	\$315.60
07/13/20	Margaret A. Dale	210	Review joint motion to extend briefing and discovery schedules in lien scope and admin expense proceedings (0.20); Review and revise reply on Rule 12(b) motion to dismiss claims/admin expense claim (4.50); Conference call with litigation team regarding tasks/strategies/deadlines (0.40).	5.10	\$4,023.90
07/13/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding expert rebuttal reports (0.10); E-mails with Proskauer team and Brattle team regarding same (0.10); Review expert reports regarding same (2.70); E-mails with M. Dale and Proskauer team regarding litigation strategy (0.20); E-mail with Brattle team regarding same (0.10).	3.20	\$2,524.80
07/13/20	Chantel L. Febus	210	Review combined draft ERS reply brief.	1.50	\$1,183.50

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Date	Timekeeper	Task	Description	Hours	Amount
07/13/20	Chantel L. Febus	210	Review case law parenthetical updates and edits from K. Curtis regarding ERS reply brief.	0.80	\$631.20
07/13/20	Chantel L. Febus	210	Communications with J. Esses and K. Curtis regarding edits to draft ERS reply.	0.50	\$394.50
07/13/20	Michael R. Hackett	210	Review recent filings (0.80); Correspondence with legal team regarding recent filings (0.40).	1.20	\$946.80
07/13/20	Russell T. Gorkin	210	Review and analyze edits to ERS opposition to motion to dismiss contracts and takings clause claims and e-mail correspondence with M. Dale, M. Harris, C. Febus and K. Curtis regarding same.	0.40	\$315.60
07/13/20	William D. Dalsen	210	Review draft expert rebuttal ultra vires report (0.40).	0.40	\$315.60
07/14/20	William D. Dalsen	210	Call with counsel to UCC and SCC regarding expert reports, depositions, and summary-judgment briefing (0.60); Review draft Doty rebuttal report (0.60); Call with M. Dale and A. Muller regarding ERS case status (0.50); Correspondence with M. Dale regarding expert discovery matters (0.20).	1.90	\$1,499.10
07/14/20	Ariella Muller	210	Call with M. Dale, J. Roche, W. Dalsen, E. Carino regarding status and strategy (0.60); Review materials in connection with same (0.70); Call with E. Carino to discuss schedule (0.30); Review briefings filed in ERS (1.30).	2.90	\$2,288.10
07/14/20	Mee R. Kim	210	Teleconference with M. Dale and Proskauer team regarding litigation strategy (0.60); E-mails with M. Dale and Brattle team regarding same (0.30); E-mails with M. Dale and Proskauer team regarding expert rebuttal reports (0.10); E-mails with Proskauer team and common interest counsel regarding same (0.10); E-mails with Proskauer team and Brattle team regarding same (0.10); E-mails with Brattle team regarding same (0.20); Review draft rebuttal report regarding same (6.50).	7.90	\$6,233.10
07/14/20	Chantel L. Febus	210	Communications with J. Esses and K. Curtis regarding edits to draft ERS reply.	0.30	\$236.70
07/14/20	Chantel L. Febus	210	Review J. Levitan edits to compiled draft ERS reply brief.	0.40	\$315.60

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Date	Timekeeper	Task	Description	Hours	Amount
07/14/20	Margaret A. Dale	210	Conference call with W. Dalsen and litigation team to discuss projects/responsibilities including A. Muller, W. Dalsen, J. Roche and E. Carino (0.60); Review revised draft of Rule 12(b) reply brief (0.70).	1.30	\$1,025.70
07/14/20	Elisa Carino	210	Call with M. Dale and ERS team regarding litigation strategy (0.60); Conference with J. Roche about strategy for motion for summary judgment (0.50).	1.10	\$867.90
07/14/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	3.90	\$3,077.10
07/14/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	4.30	\$3,392.70
07/14/20	Steven O. Weise	210	Review issues regarding motion to dismiss / 12(d) motion.	2.80	\$2,209.20
07/14/20	Jennifer L. Roche	210	Conference with Committee counsel regarding Doty rebuttal report (0.60); Conference with M. Dale, team, and A. Muller regarding case status and strategy (0.60); Conference and e-mails with E. Carino regarding lien scope summary judgment motion (0.60); Draft lien scope summary judgment motion (2.30); Review of additional materials provided by ultra vires expert (1.20).	5.30	\$4,181.70
07/15/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	4.70	\$3,708.30
07/15/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	4.10	\$3,234.90
07/15/20	William D. Dalsen	210	[REDACTED: Work relating to court-ordered mediation] (0.20); [REDACTED: Work relating to court-ordered mediation] (1.00); Call with expert regarding rebuttal report (1.00); [REDACTED: Work relating to court-ordered mediation] (0.60); [REDACTED: Work relating to court-ordered mediation] (0.50); [REDACTED: Work relating to court-ordered mediation] (0.30).	3.60	\$2,840.40

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Date	Timekeeper	Task	Description	Hours	Amount
07/15/20	Margaret A. Dale	210	Review and revise draft of Hinton rebuttal report (partial) (1.00); Conference call with Brattle and Proskauer regarding rebuttal report (0.50); [REDACTED: Work relating to court-ordered mediation] (0.20).	1.70	\$1,341.30
07/15/20	Mee R. Kim	210	E-mails with M. Dale, Proskauer team and common interest counsel regarding litigation strategy (0.10); E-mails with M. Dale and Proskauer team regarding same (0.70); E-mails with Brattle team regarding same (0.30); Review draft rebuttal report (4.70); Videoconference with Proskauer team and Brattle team regarding same (0.90).	6.70	\$5,286.30
07/15/20	Chantel L. Febus	210	Review final draft of ERS reply brief.	0.80	\$631.20
07/15/20	Ariella Muller	210	Review previously filed briefing with respect to lien scope and ultra vires arguments in preparation for drafting motion for summary judgement.	1.40	\$1,104.60
07/15/20	Jennifer L. Roche	210	Review revisions and comments to rebuttal report (0.30); E-mails with W. Dalsen regarding same (0.10); Analysis regarding lien tracing report (0.50); Conference with expert regarding lien tracing rebuttal report (0.50); Analysis regarding lien scope summary judgment statement of facts (2.50); E-mail with E. Carino regarding statement of facts (0.10).	4.00	\$3,156.00
07/16/20	Jennifer L. Roche	210	Review proposed revision to rebuttal report (0.30); Conference with Committee counsel and W. Dalsen regarding expert rebuttal report (0.30); E-mail with Committee counsel regarding further comments on report (0.20).	0.80	\$631.20
07/16/20	Joshua A. Esses	210	Review e-mail communications on ERS tracing analysis.	0.20	\$157.80
07/16/20	Jeffrey W. Levitan	210	E-mails J. Esses regarding 12(b) reply (0.30); Teleconference and e-mails P. Friedman regarding 12(b) reply (0.30); Review final 12(b) reply (1.30); Review M. Dale comments to expert report, teleconference M. Dale regarding experts, 12(b) (0.50); Review Brattle analysis of receivables, e-mail W. Dalsen regarding Doty report (0.30).	2.70	\$2,130.30
07/16/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	4.20	\$3,313.80

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Date	Timekeeper	Task	Description	Hours	Amount
07/16/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder report.	3.20	\$2,524.80
07/16/20	Mee R. Kim	210	E-mails with M. Dale, Proskauer team and common interest counsel regarding litigation strategy (0.10); E-mails with M. Dale and Proskauer team regarding same (0.40); E-mails with Brattle team regarding same (0.10); Review draft rebuttal reports (4.20).	4.80	\$3,787.20
07/16/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding status update (0.20); [REDACTED: Work relating to court-ordered mediation] (0.40).	0.60	\$473.40
07/16/20	William D. Dalsen	210	Correspondence with UCC and SCC regarding draft expert reports (0.20); Call with UCC and SCC regarding draft expert report (0.40); [REDACTED: Work relating to court-ordered mediation] (0.10); [REDACTED: Work relating to court-ordered mediation] (0.50); Correspondence with counsel to ERS Bondholders regarding motion for additional pages for reply brief (0.20); Review draft expert report on ultra vires issues (1.00).	2.40	\$1,893.60
07/17/20	William D. Dalsen	210	Review draft expert report on ultra vires issues (0.70); Call with UCC, SCC, and expert regarding draft ultra vires rebuttal report (0.50); Correspondence with team regarding draft ultra vires rebuttal report (0.50); [REDACTED: Work relating to court-ordered mediation] (0.20); Call with counsel to Retiree Committee regarding draft ultra vires expert report (0.50); Review draft ultra vires rebuttal report (1.90).	4.30	\$3,392.70
07/17/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	4.10	\$3,234.90
07/17/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	2.40	\$1,893.60
07/17/20	Margaret A. Dale	210	Review and revise Hinton rebuttal report regarding tracing (2.40); Conference call with W. Dalsen and J. Roche regarding Doty rebuttal report (0.40); Review draft of Doty rebuttal report (1.30).	4.10	\$3,234.90
07/17/20	Elisa Carino	210	Analyze deposition transcripts, expert reports and exhibits to include in statement of material facts.	6.90	\$5,444.10

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Date	Timekeeper	Task	Description	Hours	Amount
07/17/20	Jennifer L. Roche	210	Conference with E. Carino regarding lien scope motion for summary judgment (0.20); Review revisions and comments to draft expert rebuttal report (0.70); Conferences and e-mails with Committee counsel and W. Dalsen regarding rebuttal report (1.60); Analysis regarding expert report issues (0.50); Conference and e-mail with W. Dalsen and M. Dale regarding rebuttal report (0.60); Conference with Committee counsel regarding language expert rebuttal report (0.30); Follow-up conference with W. Dalsen (0.10).	4.00	\$3,156.00
07/17/20	Mee R. Kim	210	E-mails with M. Dale, Proskauer team and Brattle team regarding rebuttal report (0.10); E-mails with M. Dale regarding same (0.30); E-mails with Brattle team regarding same (0.60); E-mails with Proskauer team and common interest counsel regarding same (0.60); E-mails with M. Dale and Proskauer team regarding same (0.40); Review draft report (3.60).	5.60	\$4,418.40
07/17/20	Joshua A. Esses	210	Review expert rebuttal report.	0.50	\$394.50
07/17/20	Jeffrey W. Levitan	210	Review revised Hinton rebuttal report (1.30); Review Doty rebuttal report (0.80); E-mails R. Kim, W. Dalsen regarding expert reports (0.20).	2.30	\$1,814.70
07/18/20	Jeffrey W. Levitan	210	Review comments to draft rebuttal report (0.90); Participate in call with P. Hinton and team regarding revisions to rebuttal report (1.20); E-mail R. Kim regarding rebuttal report (0.10).	2.20	\$1,735.80
07/18/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	0.70	\$552.30
07/18/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	2.70	\$2,130.30
07/18/20	Brian S. Rosen	210	Memorandum to W. Dalsen regarding ERS/926 orders (0.10); Review opinions regarding same (0.60); Review urgent motion regarding 926 (0.80); Review W. Dalsen draft outline regarding same (0.20); Memorandum to W. Dalsen regarding same (0.10).	1.80	\$1,420.20
07/18/20	Jennifer L. Roche	210	Review proposed revised expert report (0.70); E-mails with W. Dalsen regarding draft report (0.20); Conference with Committee counsel regarding expert report (0.60).	1.50	\$1,183.50

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Date	Timekeeper	Task	Description	Hours	Amount
07/18/20	Margaret A. Dale	210	Review S. Weise comments on Hinton rebuttal report (0.50); Conference call with Brattle, S. Weise, J. Levitan and R. Kim regarding rebuttal report (1.20); E-mails with R. Kim regarding comments to Brattle on rebuttal draft (0.20).	1.90	\$1,499.10
07/18/20	William D. Dalsen	210	Revise revised expert report on ultra vires issues (1.10); Call with counsel to SCC and UCC regarding draft expert reports (0.50).	1.60	\$1,262.40
07/18/20	Mee R. Kim	210	Videoconference with M. Dale, Proskauer team and Brattle team regarding rebuttal report (1.20); E-mails with M. Dale, Proskauer team and Brattle team regarding same (0.20); E-mails with M. Dale and Proskauer team regarding same (0.60); E-mails with Brattle team regarding same (0.20); E-mails with Proskauer team and common interest counsel regarding same (0.30); Videoconference with common interest counsel and Brattle team regarding same (0.70); Review draft report (5.70).	8.90	\$7,022.10
07/19/20	Mee R. Kim	210	Videoconference with M. Dale, Proskauer team and Brattle team regarding rebuttal report (0.80); E-mails with M. Dale regarding same (0.10); E-mails with M. Dale, Proskauer team and Brattle team regarding same (0.90); E-mails with M. Dale and Proskauer team regarding same (0.80); E-mails with Brattle team regarding same (0.70); E-mails with Proskauer team and common interest counsel regarding same (0.10); Review draft report (7.90); E-mails with M. Pocha, A. Mohan and J. Esses regarding same (0.20).	11.50	\$9,073.50
07/19/20	William D. Dalsen	210	Correspondence with UCC and SCC regarding draft ultra vires report (0.10); [REDACTED: Work relating to court-ordered mediation] (0.10); [REDACTED: Work relating to court-ordered mediation] (0.40); [REDACTED: Work relating to court-ordered mediation] (0.40); [REDACTED: Work relating to court-ordered mediation] (0.20); Review draft expert report on ultra vires issues (0.80).	2.00	\$1,578.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/19/20	Margaret A. Dale	210	E-mails with R. Kim and J. Levitan regarding Hinton rebuttal expert report (0.30); Review and revise draft Hinton rebuttal expert report (1.20); Conference call with Brattle team and Proskauer team regarding draft Hinton rebuttal report (0.80).	2.30	\$1,814.70
07/19/20	Jennifer L. Roche	210	Review draft rebuttal expert report (0.50); E-mails with W. Dalsen and M. Dale regarding report (0.10); [REDACTED: Work relating to court-ordered mediation] (0.10); E-mails with J. Levitan, R. Kim and M. Dale regarding tracing rebuttal report (0.10).	0.80	\$631.20
07/19/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	4.80	\$3,787.20
07/19/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	2.30	\$1,814.70
07/19/20	Joshua A. Esses	210	Review e-mail communications on tracing analysis.	0.10	\$78.90
07/19/20	Jeffrey W. Levitan	210	Review revised rebuttal report and comments (1.10); E-mail R. Kim regarding expert reports (0.20); Participate in call with P. Hinton and team regarding rebuttal report (0.80).	2.10	\$1,656.90
07/20/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	4.20	\$3,313.80
07/20/20	Steven O. Weise	210	Review issues regarding rebuttal to tracing of collateral report by bondholder expert.	5.80	\$4,576.20
07/20/20	Jennifer L. Roche	210	Review proposed rebuttal report and revision of report (0.70); E-mails with W. Dalsen and M. Dale regarding same (0.20); Conferences with Committee counsel regarding proposed rebuttal report (0.70); Review revised Doty rebuttal report (0.30); E-mails with Committee counsel regarding same (0.10); Conference with M. Dale and ERS Litigation team regarding case status and strategy (0.30); E-mails with R. Kim regarding tracing rebuttal report (0.10).	2.40	\$1,893.60

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Date	Timekeeper	Task	Description	Hours	Amount
07/20/20	Margaret A. Dale	210	E-mails and teleconference with W. Dalsen and J. Roche regarding proposed rebuttal report on Spanish language of Enabling Act (0.50); Review, revise and finalize Hinton rebuttal report regarding tracing (3.40); E-mails with R. Kim and S. Weise regarding finalizing Hinton rebuttal report (0.50); Weekly litigation team meeting regarding status updates (0.30); E-mails with R. Kim and W. Dalsen regarding service of Hinton and Doty rebuttal reports (0.10).	4.80	\$3,787.20
07/20/20	William D. Dalsen	210	Correspondence with counsel to UCC and SCC regarding draft ultra vires expert reports (0.20); Call with Committees regarding draft ultra vires expert report (0.40); Call with M. Dale and team regarding case status, expert reports, and next steps (0.30); Call with counsel to Retiree Committee regarding draft ultra vires expert report (0.30); [REDACTED: Work relating to court-ordered mediation] (0.20); Review draft expert report on ultra vires issues (0.80).	2.20	\$1,735.80
07/20/20	Elisa Carino	210	Phone call regarding status of litigation with M. Dale, J. Roche, W. Dalsen, and A. Muller.	0.30	\$236.70
07/20/20	Ariella Muller	210	Attend ERS team call with M. Dale regarding status.	0.30	\$236.70
07/20/20	Mee R. Kim	210	E-mails with Brattle team regarding rebuttal report (3.30); E-mails with M. Dale, Proskauer team and Brattle team regarding same (0.50); E-mails with M. Dale and Proskauer team regarding same (2.20); E-mails with M. Dale and O'Melveny team regarding same (0.30); E-mails with M. Dale, Proskauer team and common interest counsel regarding same (0.40); E-mails with M. Dale regarding same (0.40); E-mails with S. Weise regarding same (0.30); Teleconferences with M. Dale regarding same (0.20); Revise rebuttal report drafts (12.30); E-mails with W. Dalsen and Proskauer team regarding served rebuttal reports (0.30); E-mail with Brattle team regarding same (0.10).	20.30	\$16,016.70

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Date	Timekeeper	Task	Description	Hours	Amount
07/21/20	Mee R. Kim	210	E-mails with W. Dalsen and Proskauer team regarding rebuttal report workpapers (0.80); E-mail with Brattle team regarding same (0.50); E-mails with S. Schaefer regarding rebuttal report documents (0.40); Teleconference with M. Dale regarding litigation strategy (0.10).	1.80	\$1,420.20
07/21/20	Russell T. Gorkin	210	Review M. Bienenstock edits to reply brief.	0.20	\$157.80
07/21/20	Chantel L. Febus	210	Review communications about and changes to ERS reply brief.	0.40	\$315.60
07/21/20	William D. Dalsen	210	Correspondence with S. Schaefer regarding expert depositions (0.10); Call with counsel to Committees regarding reply in support of Rule 12(b) motion to dismiss claims and administrative expense motions (0.40).	0.50	\$394.50
07/21/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	3.80	\$2,998.20
07/21/20	Steven O. Weise	210	Review issues regarding reply on motion to dismiss, regarding 12(d) motion.	0.80	\$631.20
07/21/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding next steps (0.20); Teleconference with R. Kim regarding Argiz rebuttal report and deposition preparation (0.30); Review M. Bienenstock's edits to Rule 12(b) reply brief (1.00).	1.50	\$1,183.50
07/21/20	Jeffrey W. Levitan	210	Review Hildreth rebuttal report (0.40); Review Agiz rebuttal report (1.10); Review Doty rebuttal report (0.20) Review comments to 12(b) reply, outline revisions (1.90); Teleconferences J. Esses regarding 12(b) (0.40); E-mails with J. Esses regarding 12(b); E-mails with W. Dalsen, C. Steege, teleconference M. Dale regarding 12(b) (0.50); Review motion and order regarding retirees reply (0.10).	4.60	\$3,629.40
07/22/20	Jeffrey W. Levitan	210	E-mails with J. Esses, L. Sizemore regarding 12(b) reply (0.40); Review internal comments to reply (0.20); Review AAFAF draft 12(b) reply (0.40); Review retiree committee draft 12(b) reply (1.20); Call and e-mails J. Esses regarding revisions (0.40); Revise 12(b) reply (3.60); Review e-mails regarding experts (0.10).	6.30	\$4,970.70
07/22/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	2.70	\$2,130.30

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Date	Timekeeper	Task	Description	Hours	Amount
07/22/20	William D. Dalsen	210	[REDACTED: Work relating to court-ordered mediation] (0.20); [REDACTED: Work relating to court-ordered mediation] (0.20); [REDACTED: Work relating to court-ordered mediation] (0.20); [REDACTED: Work relating to court-ordered mediation] (0.10); [REDACTED: Work relating to court-ordered mediation] (1.40); [REDACTED: Work relating to court-ordered mediation] (0.30); [REDACTED: Work relating to court-ordered mediation] (0.40).	2.80	\$2,209.20
07/22/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding litigation strategy (0.20); E-mails with W. Dalsen and team regarding workpaper production (0.40); E-mails with Proskauer team and litigation parties regarding same (0.20); E-mails with L. Silvestro and S. Schaefer regarding litigation documents (0.20); E-mails with Brattle team regarding same (0.20); Review documents regarding same (0.70).	1.90	\$1,499.10
07/22/20	Margaret A. Dale	210	[REDACTED: Work relating to court-ordered mediation] (0.20); E-mails with bondholders, W. Dalsen and R. Kim regarding expert rebuttal work papers (0.30); E-mails with bondholders regarding deposition schedule for experts (0.20).	0.70	\$552.30
07/23/20	Margaret A. Dale	210	[REDACTED: Work relating to court-ordered mediation] (0.20); Review Argiz rebuttal report (0.80).	1.00	\$789.00
07/23/20	William D. Dalsen	210	Correspondence with Committees and Government Parties regarding scheduling of expert depositions (0.20); Correspondence with counsel to ERS Bondholders regarding scheduling of expert depositions (0.20); [REDACTED: Work relating to court-ordered mediation] (0.50).	0.90	\$710.10
07/23/20	Jeffrey W. Levitan	210	Review Committee 12(b) joinder, final AAFAF joinder (0.50); Review final retiree reply (0.60); Review deposition schedule (0.10).	1.20	\$946.80

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Date	Timekeeper	Task	Description	Hours	Amount
07/23/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	3.30	\$2,603.70
07/24/20	William D. Dalsen	210	[REDACTED: Work relating to court-ordered mediation] (0.20); [REDACTED: Work relating to court-ordered mediation] (0.40).	0.60	\$473.40
07/24/20	Margaret A. Dale	210	[REDACTED: Work relating to court-ordered mediation] (0.20).	0.20	\$157.80
07/24/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding litigation strategy (0.20).	0.20	\$157.80
07/24/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	2.90	\$2,288.10
07/25/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	5.30	\$4,181.70
07/25/20	Jennifer L. Roche	210	Draft ERS lien scope summary judgment motion.	4.40	\$3,471.60
07/25/20	William D. Dalsen	210	Correspondence with team regarding bondholder production of third-party documents today (0.40).	0.40	\$315.60
07/25/20	Mee R. Kim	210	E-mails with W. Dalsen and Proskauer team regarding litigation strategy (0.20).	0.20	\$157.80
07/26/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	6.40	\$5,049.60
07/27/20	Jennifer L. Roche	210	E-mails with W. Dalsen regarding lien scope issues (0.20); Analysis regarding lien scope summary judgment issues (0.90); E-mails with S. Weise and J. Levitan regarding same (0.10).	1.20	\$946.80
07/27/20	Joshua A. Esses	210	Review correspondence on lien-scope adversary proceeding.	0.20	\$157.80
07/27/20	Margaret A. Dale	210	Review J. Roche and W. Dalsen e-mails with questions/answers concerning lien scope summary judgment and respond to same (0.50); E-mails with R. Kim regarding lien scope issues (0.20).	0.70	\$552.30
07/27/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	6.80	\$5,365.20
07/27/20	William D. Dalsen	210	Correspondence with J. Roche regarding arguments for summary-judgment motion in lien-tracing proceeding (0.40).	0.40	\$315.60
07/27/20	Jeffrey W. Levitan	210	[REDACTED: Work relating to court-ordered mediation].	0.50	\$394.50

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Date	Timekeeper	Task	Description	Hours	Amount
07/27/20	Mee R. Kim	210	E-mail with M. Dale regarding expert deposition strategy (0.20); E-mails with Brattle team regarding same (0.30); E-mails with M. Dale, W. Dalsen, and O'Melveny team regarding same (0.10); E-mails with S. Schaefer regarding same (0.10); E-mails with W. Dalsen and Proskauer team regarding litigation strategy (1.50); Review expert deposition strategy (2.40).	4.60	\$3,629.40
07/28/20	Mee R. Kim	210	E-mails with Brattle team regarding expert deposition strategy (0.20); E-mails with W. Dalsen and Proskauer team regarding litigation strategy (0.70); E-mails with Proskauer team and Brattle team regarding same (0.20); Videoconference with Proskauer team and Brattle team regarding same (1.80); Review expert deposition strategy (1.70).	4.60	\$3,629.40
07/28/20	William D. Dalsen	210	Correspondence with L. Silvestro regarding Alegria deposition transcript and need for exhibit correction (0.10).	0.10	\$78.90
07/28/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	4.70	\$3,708.30
07/28/20	Jennifer L. Roche	210	Analysis regarding issues for ERS lien scope summary judgment brief.	2.00	\$1,578.00
07/28/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding ERS bondholder Court of Claims case and amended complaint (0.20); E-mails with J. Levitan and S. Weise regarding rebuttal expert tracing report issues (0.10); Review Argiz rebuttal expert report (1.00); Conference call with Brattle, J. Levitan, R. Kim regarding Argiz rebuttal report and deposition preparation (1.80).	3.10	\$2,445.90
07/28/20	Joshua A. Esses	210	Analyze bondholder complaint in Court of federal claims.	1.40	\$1,104.60
07/28/20	Jeffrey W. Levitan	210	Review Court of claims pleadings (0.60); E-mail M. Pocha, teleconferences M. Dale, J. Esses, e-mails K. Perra regarding Court of claims case (0.50); Review S. Weise lien scope analysis. e-mails S. Weise regarding same, experts (0.40); Review Argiz rebuttal report to prepare for call (0.40); Participate in call with P. Hinton and team regarding Argiz rebuttal report (1.80).	3.70	\$2,919.30

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Date	Timekeeper	Task	Description	Hours	Amount
07/29/20	Jeffrey W. Levitan	210	Review lien scope issues list, S. Weise analysis to prepare for team call (0.40); Participate in call with J. Roche and team regarding lien scope (1.40); Review bank statement documents (0.30); E-mails S. Weise , J. Roche regarding funds flow (0.30); Review analysis of Argiz reports (0.20); E-mail M. Harris, review black line complaint, e-mail j. Esses regarding Court of claims action (0.50); E-mail R. Kim regarding AUC (0.20).	3.30	\$2,603.70
07/29/20	William D. Dalsen	210	Call with J. Roche and team regarding summary judgment motion (1.40); Correspondence with counsel to Retiree Committee regarding Corning deposition exhibits (0.10).	1.50	\$1,183.50
07/29/20	Jennifer L. Roche	210	Prepare for call with J. Levitan, M. Dale, J. Esses, W. Dalsen and R. Kim regarding lien scope issues (0.20); Conference with J. Levitan, M. Dale, J. Esses, W. Dalsen and R. Kim regarding lien scope issues (1.40); Draft lien scope motion for summary judgment (1.50); Conference with E. Carino regarding separate statement issues (0.30).	3.40	\$2,682.60
07/29/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	2.20	\$1,735.80
07/29/20	Elisa Carino	210	Conference with J. Roche regarding draft statement of material facts.	0.30	\$236.70
07/29/20	Margaret A. Dale	210	Review ERS Enabling Act and Bond resolution/offering statement (0.70); Conference call with J. Levitan, J. Roche, W. Dalsen and R. Kim regarding summary judgment motion on scope of bondholders' lien (1.40); E-mails with J. Levitan and R. Kim regarding Argiz rebuttal report issues (0.50); E-mails with W. Dalsen regarding bondholder Court of Claim filing of amended complaint related to takings claims (0.40).	3.00	\$2,367.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/29/20	Mee R. Kim	210	E-mails with Brattle team regarding expert deposition strategy (0.10); Teleconference with M. Dale and Proskauer team regarding litigation strategy (1.40); E-mails with M. Dale regarding same (0.20); E-mails with M. Dale and Proskauer team regarding same (2.00); Review documents regarding same (1.90); E-mails with S. Schaefer regarding same (0.20); E-mail with J. Roche regarding same (0.10); E-mails with M. Dale and W. Dalsen regarding same (0.40); E-mails with Proskauer team and Brattle team regarding same (0.20).	6.50	\$5,128.50
07/29/20	Brian S. Rosen	210	Review M. Firestein memorandum regarding tolling stipulation/DRA (0.20); Memorandum to M. Firestein regarding same (0.10); Teleconference to M. Firestein regarding same (0.20); Review DRA correspondence and pleadings (0.40); Memorandum to M. Firestein regarding same (0.10); Review M. Firestein memorandum regarding DRA agreement (0.10); Memorandum to M. Firestein regarding same (0.10).	1.20	\$946.80
07/30/20	Brian S. Rosen	210	Memorandum to J. Esses regarding result chart (0.20).	0.20	\$157.80
07/30/20	Kevin J. Perra	210	Review and analyze bondholders motion to amend complaint in Court of claims case (0.70); Call with J. Levitan and others regarding strategy for same (0.80).	1.50	\$1,183.50
07/30/20	Mark Harris	210	Review complaint and background cases (1.00); Review same with team regarding opposition to complaint (0.70).	1.70	\$1,341.30
07/30/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	2.80	\$2,209.20
07/30/20	Mee R. Kim	210	E-mails with Brattle team and Proskauer team regarding expert deposition strategy (0.20).	0.20	\$157.80
07/30/20	Jeffrey W. Levitan	210	Review Court of claims complaint to prepare for call (0.50); Participate in call with K. Perra and team regarding Court of claims action (0.80); Review W. Dalsen e-mails regarding cert. petition (0.20); E-mails M. Pocha regarding Court of claims (0.10).	1.60	\$1,262.40
07/31/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	1.60	\$1,262.40
07/31/20	Ehud Barak	210	Call with J. Levitan regarding case strategy.	0.30	\$236.70

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Date	Timekeeper	Task	Description	Hours	Amount
07/31/20	Mee R. Kim	210	E-mails with M. Dale and W. Dalsen regarding litigation strategy (0.30); E-mails with M. Dale and Proskauer team regarding same (0.10); E-mails with Brattle team regarding same (0.10); Revise memorandum regarding same (4.70).	5.20	\$4,102.80
07/31/20	Margaret A. Dale	210	E-mails with R. Kim and W. Dalsen regarding expert deposition work plan (0.30).	0.30	\$236.70
07/31/20	Jeffrey W. Levitan	210	Review Hinton analysis of rebuttal report (0.20); Teleconference E. Barak regarding strategy (0.30); E-mails M. Pocha, B. Rosen regarding Court of claims (0.20).	0.70	\$552.30
07/31/20	Brian S. Rosen	210	Memorandum to J. Levitan regarding Court of claims litigation (0.10); Review J. Levitan memorandum regarding same (0.10).	0.20	\$157.80
Analysis and Strategy				553.70	\$436,869.30

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Date	Timekeeper	Task	Description	Hours	Amount
07/01/20	Dennis T. Mcpeck	212	Compile all cases cited to in draft Rule 12(c) opposition brief per W. Dalsen.	3.30	\$891.00
07/01/20	Shealeen E. Schaefer	212	Review production documents to identify materials regarding bonds.	2.10	\$567.00
07/01/20	Shealeen E. Schaefer	212	Update master production index to include additional information regarding productions.	1.10	\$297.00
07/01/20	Shealeen E. Schaefer	212	Update and organize case database to incorporate additional materials.	0.80	\$216.00
07/01/20	Joan K. Hoffman	212	Cite-check opposition to motion for judgment on the pleadings concerning claims and administrative expense motions.	2.30	\$621.00
07/01/20	Julia L. Sutherland	212	Review Title III pleadings for previous filing of ERS bonds per E. Carino and W. Dalsen.	2.00	\$540.00
07/02/20	Joan K. Hoffman	212	Cite-check opposition to motion for judgment on the pleadings concerning claims and administrative expense motions.	4.40	\$1,188.00
07/02/20	Shealeen E. Schaefer	212	Review bondholders' expert reports including appended materials.	2.60	\$702.00
07/02/20	Shealeen E. Schaefer	212	Review Board expert reports.	0.90	\$243.00
07/02/20	Shealeen E. Schaefer	212	Review production documents identified in bondholders' expert reports.	1.70	\$459.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/02/20	Shealeen E. Schaefer	212	Update case databases to incorporate discovery documents and correspondence.	0.70	\$189.00
07/02/20	Dennis T. Mcpeck	212	Compile all appellate briefing (0.50); Compile all cases cited to (3.30).	3.80	\$1,026.00
07/02/20	Eric R. Chernus	212	Submit document for loading in preparation of production with loading and foldering instructions (0.40); Quality-control document load and release to case team (0.20); Quality-control finalized production set and escalate coding and specification questions to case team (0.30); Review production population with vendor and discuss formatting and numbering (0.40); Submit production volume and instructions to vendor, with needed timing and delivery specifications (0.60); Review production timing with case team and vendor, and discuss delivery options (0.40).	2.30	\$621.00
07/02/20	Olaide M. Adejobi	212	Save expert reports to network folder per S. Schaeffer (0.10); Organize link per same (0.20).	0.30	\$81.00
07/03/20	Eric R. Chernus	212	Quality-control Hinton 001 production and release to case team with dissemination instructions (1.10).	1.10	\$297.00
07/03/20	Shealeen E. Schaefer	212	Review production documents cited in bondholders' expert reports.	0.70	\$189.00
07/04/20	Shealeen E. Schaefer	212	Identify materials in connection with expert reports.	0.50	\$135.00
07/04/20	Joan K. Hoffman	212	Cite-check opposition to motion for judgment on the pleadings concerning claims and administrative expense motions.	4.60	\$1,242.00
07/05/20	Joan K. Hoffman	212	Cite-check opposition to motion for judgment on the pleadings concerning claims and administrative expense motions.	3.90	\$1,053.00
07/05/20	Shealeen E. Schaefer	212	Review production documents to identify materials in connection with expert reports.	1.00	\$270.00
07/06/20	Shealeen E. Schaefer	212	Draft document detailing key testimony in action.	2.70	\$729.00
07/06/20	Shealeen E. Schaefer	212	Continue review and analysis of production documents to identify materials in connection with expert reports.	3.90	\$1,053.00
07/06/20	Joan K. Hoffman	212	Cite-check opposition to motion for judgment on the pleadings concerning claims and administrative expense motions.	5.70	\$1,539.00
07/06/20	Olaide M. Adejobi	212	Confirm that deposition exhibits are complete.	0.30	\$81.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/06/20	Eric R. Chernus	212	Send new document set to vendor with loading and foldering instructions (0.30); Quality-control document loads and discuss numbering and naming, along with production options with case team (0.40).	0.70	\$189.00
07/07/20	Olaide M. Adejobi	212	Draft index of deposition exhibits per S. Schaefer and L. Silvestro.	3.20	\$864.00
07/07/20	Lawrence T. Silvestro	212	Draft deposition summaries and assign confidentiality designations for witnesses (3.60); Review expert witness reports for cited source materials (1.90).	5.50	\$1,485.00
07/07/20	Laura M. Geary	212	Summarize C. Tirado Soto deposition per S. Schaefer.	2.60	\$702.00
07/07/20	Joan K. Hoffman	212	Cite-check opposition to motion for judgment on the pleadings concerning claims and administrative expense motions (9.60); Draft table of authorities for same (3.30).	12.90	\$3,483.00
07/07/20	Shealeen E. Schaefer	212	Identify materials in connection with expert reports.	0.90	\$243.00
07/07/20	Shealeen E. Schaefer	212	Review case records to identify materials in support of motion for summary judgment.	0.60	\$162.00
07/07/20	Shealeen E. Schaefer	212	Review case management order in connection with upcoming Court filings in matter.	0.40	\$108.00
07/07/20	Shealeen E. Schaefer	212	Confer with attorneys regarding bondholders experts' materials.	0.30	\$81.00
07/07/20	Shealeen E. Schaefer	212	Draft document detailing key testimony in action.	1.80	\$486.00
07/07/20	Shealeen E. Schaefer	212	Update case databases to incorporate discovery materials and communications.	0.90	\$243.00
07/07/20	Shealeen E. Schaefer	212	Review Chris Delaney's deposition errata.	0.30	\$81.00
07/07/20	Shealeen E. Schaefer	212	Confer with L. Geary regarding deposition summaries.	0.20	\$54.00
07/07/20	Shealeen E. Schaefer	212	Review expert work papers produced by bondholders.	0.40	\$108.00
07/08/20	Joan K. Hoffman	212	Cite-check opposition to motion for judgment on the pleadings concerning claims and administrative expense motions (7.70); Prepare table of authorities and table of contents for same (5.10).	12.80	\$3,456.00
07/08/20	Joan K. Hoffman	212	Revise opposition to claimants' motion for judgment on the pleadings pursuant to FRCP 12(c).	0.40	\$108.00
07/08/20	Shealeen E. Schaefer	212	Prepare document detailing key testimony in action.	3.30	\$891.00
07/08/20	Shealeen E. Schaefer	212	Identify materials in connection with expert reports.	2.60	\$702.00

Date	Timekeeper	Task	Description	Hours	Amount
07/08/20	Laura M. Geary	212	Summarize C. Tirado Soto deposition per S. Schaefer.	2.40	\$648.00
07/08/20	Lawrence T. Silvestro	212	Review deposition errata's against transcripts (1.10); Draft deposition summaries and assign confidentiality designations for witnesses (3.10).	4.20	\$1,134.00
07/08/20	Tal J. Singer	212	Research regarding motion to dismiss claims per M. Volin.	1.10	\$297.00
07/09/20	Olaide M. Adejobi	212	Identify missing deposition errata sheets per S. Schaefer.	0.40	\$108.00
07/09/20	Eric R. Chernus	212	Download and send specified Bondholder expert reports to case team, with instructions on where they can be found in the workspace (0.40); Update specified searches to include missing documents (0.70); Send newly received documents with loading and foldering instructions (0.30).	1.40	\$378.00
07/09/20	Lawrence T. Silvestro	212	Draft deposition summaries and assign confidentiality designations for witnesses (4.40); Confer with J. Roche and team regarding summary judgment planning (0.40).	4.80	\$1,296.00
07/09/20	Shealeen E. Schaefer	212	Confer with J. Roche and W. Dalsen regarding motion for summary judgment.	0.40	\$108.00
07/09/20	Shealeen E. Schaefer	212	Review case records and discovery documents to identify materials in support of motion for summary judgment.	2.40	\$648.00
07/09/20	Shealeen E. Schaefer	212	Draft summaries of key testimony in matters.	5.30	\$1,431.00
07/09/20	Shealeen E. Schaefer	212	Draft task list and agenda for call with attorneys related to motion for summary judgment.	0.20	\$54.00
07/09/20	Laura M. Geary	212	Summarize R. Ramos deposition per S. Schaefer.	3.20	\$864.00
07/10/20	Shealeen E. Schaefer	212	Draft document detailing key testimony and exhibits in action.	3.40	\$918.00
07/10/20	Laura M. Geary	212	Incorporate R. Ramos and C. Tirado's errata corrections into deposition summaries per S. Schaefer.	0.60	\$162.00
07/10/20	Shealeen E. Schaefer	212	Update and organize case database to incorporate additional materials.	1.10	\$297.00
07/10/20	Shealeen E. Schaefer	212	Review Tirado deposition errata.	0.10	\$27.00
07/10/20	Shealeen E. Schaefer	212	Review Collazo deposition errata.	0.20	\$54.00
07/10/20	Shealeen E. Schaefer	212	Review materials cited in Hildreth report.	0.90	\$243.00
07/10/20	Shealeen E. Schaefer	212	Review case records to verify collection of deposition materials.	1.90	\$513.00
07/10/20	Shealeen E. Schaefer	212	E-mails with eDiscovery regarding data uploads to review platform.	0.20	\$54.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/10/20	Lawrence T. Silvestro	212	Draft deposition summaries and assign confidentiality designations for witnesses (3.40).	3.40	\$918.00
07/10/20	Eric R. Chernus	212	Review claim objection documents and compare with originally provided zip file (0.60); Discuss discrepancy with case team and update folder to reflect proper contents (0.50).	1.10	\$297.00
07/11/20	Shealeen E. Schaefer	212	Review Hildreth's expert report.	0.90	\$243.00
07/11/20	Shealeen E. Schaefer	212	E-mail with W. Dalsen regarding materials in Hildreth's expert report.	0.10	\$27.00
07/12/20	Shealeen E. Schaefer	212	Online research to identify and download materials in Bondholders' expert reports.	3.00	\$810.00
07/13/20	Shealeen E. Schaefer	212	Update case databases to incorporate correspondence and key documents.	0.80	\$216.00
07/13/20	Shealeen E. Schaefer	212	Research to identify and download materials in bondholders' expert reports.	3.70	\$999.00
07/13/20	Lawrence T. Silvestro	212	Prepare deposition summaries and assign confidentiality designations for witnesses (1.60); Review expert witness reports for cited source materials (1.10).	2.70	\$729.00
07/13/20	Laura M. Geary	212	Summarize A. Chang deposition per S. Schaefer.	2.30	\$621.00
07/13/20	Eric R. Chernus	212	Review and update searches per case team request (0.40).	0.40	\$108.00
07/14/20	Laura M. Geary	212	Summarize A. Chang deposition per S. Schaefer (1.60); Add errata corrections to excel for same (0.60).	2.20	\$594.00
07/14/20	Lawrence T. Silvestro	212	Prepare deposition summaries and assign confidentiality designations for witnesses (3.10); Review expert witness reports for cited source materials (2.60).	5.70	\$1,539.00
07/14/20	Shealeen E. Schaefer	212	Review e-mails from Court reporter regarding errata sheets.	0.20	\$54.00
07/14/20	Shealeen E. Schaefer	212	Review case databases to identify materials in support of motion for summary judgment.	1.30	\$351.00
07/15/20	Shealeen E. Schaefer	212	Draft master workbook to identify of key testimony and associated exhibits.	3.40	\$918.00
07/15/20	Shealeen E. Schaefer	212	Analysis of case documents to identify materials in support of motion for summary judgment.	2.10	\$567.00
07/15/20	Lawrence T. Silvestro	212	Prepare deposition summaries and assign confidentiality designations for witnesses (2.10); Review and download expert witness reports for cited source materials (1.30).	3.40	\$918.00
07/15/20	Joan K. Hoffman	212	Digest Christopher Delaney deposition.	7.40	\$1,998.00
07/15/20	Julia L. Sutherland	212	Review and revise citations used in reply in support of motion to dismiss bondholders expense claims.	0.40	\$108.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/15/20	Angelo Monforte	212	Review Prime Clerk for Retiree Committee claims against ERS per J. Esses.	0.20	\$54.00
07/15/20	Tal J. Singer	212	Research regarding Retiree Committee claims per J. Esses.	0.80	\$216.00
07/16/20	Julia L. Sutherland	212	Review and revise citations used in reply in support of motion to dismiss bondholders expense claims.	0.80	\$216.00
07/16/20	Joan K. Hoffman	212	Digest Christopher Delaney deposition.	2.10	\$567.00
07/16/20	Shealeen E. Schaefer	212	Draft document detailing key testimony and exhibits in action.	1.70	\$459.00
07/16/20	Shealeen E. Schaefer	212	Review e-mails with Court reporter regarding deposition errata sheets.	0.20	\$54.00
07/16/20	Shealeen E. Schaefer	212	E-mail with eDiscovery regarding document production.	0.10	\$27.00
07/16/20	Lela Lerner	212	Review and revise case and record citations for draft reply in support of motion to dismiss.	1.00	\$270.00
07/16/20	Lawrence T. Silvestro	212	Prepare deposition summaries and assign confidentiality designations for witnesses (2.90); Review deposition database to determine how to assign confidentiality designations electronically (1.20).	4.10	\$1,107.00
07/17/20	Julia L. Sutherland	212	Review and revise citations used in reply in support of motion to dismiss bondholders expense claims.	0.80	\$216.00
07/17/20	Shealeen E. Schaefer	212	Identify and review materials cited in bondholders' expert reports.	3.10	\$837.00
07/17/20	Angelo Monforte	212	Compile and distribute appeal briefing, underlying briefing, and case law cited in same per W. Dalsen.	1.40	\$378.00
07/17/20	Lawrence T. Silvestro	212	Conform expert witness report materials (0.90).	0.90	\$243.00
07/18/20	Joan K. Hoffman	212	Digest P. Ortiz Cortes deposition in preparation of summary judgment brief.	4.80	\$1,296.00
07/18/20	Lela Lerner	212	Review and revise case and record citations for draft reply in support of motion to dismiss.	2.50	\$675.00
07/19/20	Dennis T. Mcpeck	212	Format legal citations in motion to dismiss brief (1.50).	1.50	\$405.00
07/19/20	Joan K. Hoffman	212	Digest P. Ortiz Cortes deposition in preparation of summary judgment brief.	9.50	\$2,565.00
07/20/20	Lawrence T. Silvestro	212	Review and identify documents cited in expert witness and rebuttal reports (2.30); Collect said cited documents (3.20); Prepare and transmit Board urgent consent motions to extend page limit for service (0.20).	5.70	\$1,539.00
07/20/20	Shealeen E. Schaefer	212	Review discovery documents to identify materials in support of motion to dismiss.	2.60	\$702.00
07/20/20	Shealeen E. Schaefer	212	Organize and review materials cited in expert reports.	4.80	\$1,296.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/20/20	Joan K. Hoffman	212	Digest P. Ortiz Cortes deposition for preparation of summary judgment brief.	1.90	\$513.00
07/20/20	Dennis T. Mcpeck	212	Review legal citations in reply in support of motion to disallow and dismiss claims (2.50).	2.50	\$675.00
07/20/20	Angelo Monforte	212	Submit filed version of urgent motion to exceed page limit and proposed order to chambers.	0.20	\$54.00
07/20/20	Lela Lerner	212	Final proof and check of case and record citations for draft reply in support of motion to dismiss.	1.50	\$405.00
07/20/20	Julia L. Sutherland	212	Review and revise case law citations used in reply in support of motion to dismiss bondholders expense claims (3.70); Review and revise record citations in connection with the same (2.90).	6.60	\$1,782.00
07/21/20	Julia L. Sutherland	212	Review and revise citations used in reply in support of motion to dismiss bondholders expense claims (4.00); Review and revise cross-references in connection with the same (1.80).	5.80	\$1,566.00
07/21/20	Eric R. Chernus	212	Review second HINTON production document set and send to vendor with processing and loading instructions (0.60); Send production specifications to vendor with timing and delivery needs (0.50); Escalate production issues to case team and discuss document issues and place holders (0.30); Quality-check production and release set to case team with dissemination instructions (1.30).	2.70	\$729.00
07/21/20	Olaide M. Adejobi	212	Compile expert report rebuttals and coordinate hand delivery to M. Dale.	0.70	\$189.00
07/21/20	Olaide M. Adejobi	212	Update binder of rebuttal expert reports and compile replies to motion to dismiss and disallow claims per L. Silvestro (0.80); Coordinate with copy center and mailroom to send documents to M. Dale (0.30).	1.10	\$297.00
07/21/20	Laura M. Geary	212	Cite-check pages 40-49 of reply in support of motion to dismiss ERS bondholder claims.	2.20	\$594.00
07/21/20	Shealeen E. Schaefer	212	Review Engman deposition errata.	0.30	\$81.00
07/21/20	Shealeen E. Schaefer	212	Identify materials for expert depositions.	4.30	\$1,161.00
07/22/20	Lawrence T. Silvestro	212	Review and identify documents cited in expert witness and rebuttal reports (1.80); Collect said cited documents and Court filings (3.10); Prepare and transmit Board response brief for service (0.20).	5.10	\$1,377.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/22/20	Shealeen E. Schaefer	212	Identify and organize materials for expert depositions.	5.40	\$1,458.00
07/22/20	Shealeen E. Schaefer	212	Review e-mails from eDiscovery and W. Dalsen regarding expert production.	0.20	\$54.00
07/22/20	Shealeen E. Schaefer	212	Update master production index to include additional information regarding productions.	0.50	\$135.00
07/22/20	Laura M. Geary	212	Cite-check alterations to ERS reply in support of disallowing and dismissing bondholder claims.	0.40	\$108.00
07/22/20	Eric R. Chernus	212	Export Hinton productions to specified location per case team request (0.40); Create searches to specified document set and quality-check list to find missing documents (0.70).	1.10	\$297.00
07/22/20	Julia L. Sutherland	212	Review and revise citations used in reply in support of motion to dismiss bondholders expense claims (1.30); Draft table of authorities in connection with the same (2.10).	3.40	\$918.00
07/23/20	Lawrence T. Silvestro	212	Review and identify documents cited in expert witness rebuttal reports (2.70); Collect and organize all source materials and Court filings (1.80); Calls and e-mails concerning virtual expert deposition logistics (0.40); Review incorrectly marked deposition exhibits (0.30).	5.20	\$1,404.00
07/23/20	Olaide M. Adejobi	212	Compile replies to motion to dismiss and disallow claims and send to M. Dale (0.30); Compile additional expert report rebuttals and send to M. Dale (0.30).	0.60	\$162.00
07/23/20	Olaide M. Adejobi	212	Update deposition exhibit index per L. Silvestro (0.70); Update calendar and schedule with scheduled expert report depositions (1.10).	1.80	\$486.00
07/23/20	Shealeen E. Schaefer	212	Identification of materials for expert depositions.	4.80	\$1,296.00
07/23/20	Shealeen E. Schaefer	212	Update and organize case database to incorporate additional expert materials.	2.60	\$702.00
07/23/20	Shealeen E. Schaefer	212	Review e-mails from William Dalsen regarding expert depositions.	0.10	\$27.00
07/23/20	Shealeen E. Schaefer	212	Review e-mails from Jones Day regarding expert depositions.	0.20	\$54.00
07/23/20	Joan K. Hoffman	212	Summarize deposition transcript of Juan Cancel Alegria.	0.80	\$216.00
07/24/20	Joan K. Hoffman	212	Summarize deposition transcript of Juan Cancel Alegria.	6.70	\$1,809.00
07/24/20	Laura M. Geary	212	Draft summary for Luis Manuel Collazo Rodriguez deposition p. 1-117 per S. Schaefer.	2.30	\$621.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/24/20	Shealeen E. Schaefer	212	Review and verify deposition exhibits in preparation for Motion for Summary Judgment.	0.90	\$243.00
07/24/20	Shealeen E. Schaefer	212	[REDACTED: Work relating to court-ordered mediation].	0.10	\$27.00
07/24/20	Shealeen E. Schaefer	212	Review Bondholders' expert reports in preparation for depositions.	3.90	\$1,053.00
07/24/20	Olaide M. Adejobi	212	Identify duplicates of deposition exhibits per L. Silvestro.	2.80	\$756.00
07/25/20	Joan K. Hoffman	212	Summarize deposition of Juan Cancel Alegria.	5.20	\$1,404.00
07/26/20	Shealeen E. Schaefer	212	Review Argiz expert reports in preparation for deposition.	1.90	\$513.00
07/26/20	Joan K. Hoffman	212	Summarize deposition of Juan Cancel Alegria.	7.30	\$1,971.00
07/27/20	Shealeen E. Schaefer	212	Draft master workbook detailing all references and citations from experts' initial and rebuttal reports.	5.60	\$1,512.00
07/27/20	Laura M. Geary	212	Draft deposition summary for L. M. Collazo Rodriguez through p. 290 per S. Schaefer.	4.10	\$1,107.00
07/27/20	Lawrence T. Silvestro	212	Review and identify documents cited in expert witness rebuttal reports (1.20); Collect and organize all source materials and Court filings (3.30); Telephone calls with S. Schaefer regarding preparation for summary judgment (0.60).	5.10	\$1,377.00
07/27/20	Olaide M. Adejobi	212	Identify duplicate documents across all deposition exhibits and draft index of all documents.	2.60	\$702.00
07/28/20	Olaide M. Adejobi	212	Identify duplicate documents across all deposition exhibits and index them (3.30).	3.30	\$891.00
07/28/20	Eric R. Chernus	212	Review data file issues brought up by vendor regarding newly received production (0.40); Discuss issues with case team and messaging for sender (0.30); Discuss with vendor message regarding family ranges and work around for family relationship (0.30); Quality-check loaded set and family relationships and release production to case team (0.60).	1.60	\$432.00
07/28/20	Laura M. Geary	212	Draft deposition summary for L. M. Collazo Rodriguez p. 290 through end per S. Schaefer.	1.80	\$486.00
07/28/20	Laura M. Geary	212	Compile ERS briefing per P. Fishkind.	0.20	\$54.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/28/20	Lawrence T. Silvestro	212	Analyze documents cited in expert witness rebuttal reports and deposition preparation (2.30); Organize all source materials and Court filings in said reports and depositions (3.60); Review source materials in preparation for summary judgment (1.10).	7.00	\$1,890.00
07/28/20	Shealeen E. Schaefer	212	Review e-mails regarding processing issues related to Jones Day's 7/25/2020 document production.	0.20	\$54.00
07/28/20	Shealeen E. Schaefer	212	Review communications history with Jones Day regarding discovery matters in connection with verifying confidentiality designations associated with depositions.	0.60	\$162.00
07/28/20	Shealeen E. Schaefer	212	Confer with L. Silvestro regarding logistics and preparations for upcoming expert depositions.	0.40	\$108.00
07/28/20	Shealeen E. Schaefer	212	Review Bondholders' expert reports to verify citations.	4.80	\$1,296.00
07/29/20	Lawrence T. Silvestro	212	Confer with S. Schaefer regarding possible inconsistencies with deposition exhibits (0.80); Analyze documents cited in expert witness initial reports, rebuttal reports and deposition preparation (3.60); Review and cross reference errors in deposition exhibits misidentified in transcripts for resolution by Court reporting service (1.60); Confer with S. Schaefer regarding documents cited in Bondholders' expert reports (0.90).	6.90	\$1,863.00
07/29/20	Shealeen E. Schaefer	212	Confer with L. Silvestro regarding possible inconsistencies with deposition exhibits.	0.80	\$216.00
07/29/20	Shealeen E. Schaefer	212	Confer with L. Silvestro regarding documents cited in Bondholders' expert reports.	0.90	\$243.00
07/29/20	Shealeen E. Schaefer	212	Research Puerto Rico laws and authorities cited in expert reports.	1.60	\$432.00
07/29/20	Shealeen E. Schaefer	212	Update master workbook detailing key testimony in matter.	0.40	\$108.00
07/29/20	Laura M. Geary	212	Cross-check de-duplicated list of ERS deposition exhibits.	0.40	\$108.00
07/29/20	Olaide M. Adejobi	212	Review and revise de-duplicated deposition exhibit index (1.10); E-mails with L. Silvestro and S. Schaefer regarding inconsistencies with exhibits (0.40).	1.50	\$405.00
07/30/20	Lawrence T. Silvestro	212	Review and organize documents cited in expert witness initial reports, rebuttal reports and for expert deposition preparation (0.90).	0.90	\$243.00

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Date	Timekeeper	Task	Description	Hours	Amount
07/30/20	Charles H. King	212	Prepare citations in Board opposition per W. Dalsen (3.50).	3.50	\$945.00
07/30/20	Shealeen E. Schaefer	212	Update and organize case database to incorporate additional expert materials.	1.40	\$378.00
07/30/20	Shealeen E. Schaefer	212	Confer with L. Silvestro regarding expert depositions.	0.30	\$81.00
07/31/20	Shealeen E. Schaefer	212	Review e-mails with Court reporter regarding deposition scheduling.	0.20	\$54.00
07/31/20	Shealeen E. Schaefer	212	Confer with L. Silvestro regarding tasks associated with upcoming expert depositions.	0.40	\$108.00
07/31/20	Lawrence T. Silvestro	212	Confer with S. Schaefer regarding expert depositions (0.40); Review and organize documents related to motion for summary judgment (1.10); Identify and locate sources cited in expert rebuttal reports for deposition preparation (1.10).	2.60	\$702.00
General Administration				382.00	\$103,140.00

Employment and Fee Applications -- 218

Date	Timekeeper	Task	Description	Hours	Amount
07/06/20	Natasha Petrov	218	Draft exhibits to Proskauer 9th interim fee application.	0.80	\$216.00
07/07/20	Natasha Petrov	218	Continue drafting exhibits to Proskauer 9th interim fee application.	0.40	\$108.00
07/20/20	Natasha Petrov	218	Review additional data from Finance Department (0.30); Continue drafting exhibits to Proskauer 9th interim fee application (0.20).	0.50	\$135.00
07/21/20	Natasha Petrov	218	Continue drafting Proskauer 9th interim fee application.	3.10	\$837.00
07/24/20	Natasha Petrov	218	Continue review of main cases, adversary, and appellate dockets and pleadings for 9th interim fee application (0.70); Continue drafting narratives for same (0.70).	1.40	\$378.00
07/29/20	Natasha Petrov	218	Review April and May monthly statements for certain entries and redact same for 9th interim fee application.	1.10	\$297.00
Employment and Fee Applications				7.30	\$1,971.00

Total for Professional Services**\$846,771.00**

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Timekeeper Summary

Timekeeper	Status	Hours	Rate	Value
BRIAN S. ROSEN	PARTNER	4.00	789.00	\$3,156.00
CHANTEL L. FEBUS	PARTNER	37.30	789.00	\$29,429.70
EHUD BARAK	PARTNER	44.40	789.00	\$35,031.60
JEFFREY W. LEVITAN	PARTNER	115.80	789.00	\$91,366.20
KEVIN J. PERRA	PARTNER	1.50	789.00	\$1,183.50
LARY ALAN RAPPAPORT	PARTNER	0.50	789.00	\$394.50
MARGARET A. DALE	PARTNER	59.30	789.00	\$46,787.70
MARK HARRIS	PARTNER	11.40	789.00	\$8,994.60
MARTIN J. BIENENSTOCK	PARTNER	33.30	789.00	\$26,273.70
MICHAEL A. FIRESTEIN	PARTNER	0.10	789.00	\$78.90
MICHAEL R. HACKETT	PARTNER	1.20	789.00	\$946.80
STEVEN O. WEISE	PARTNER	182.60	789.00	\$144,071.40
TIMOTHY W. MUNGOVAN	PARTNER	0.50	789.00	\$394.50
Total for PARTNER		491.90		\$388,109.10
JENNIFER L. ROCHE	SENIOR COUNSEL	61.20	789.00	\$48,286.80
Total for SENIOR COUNSEL		61.20		\$48,286.80
ADAM L. DEMING	ASSOCIATE	16.50	789.00	\$13,018.50
ARIELLA MULLER	ASSOCIATE	5.20	789.00	\$4,102.80
ELISA CARINO	ASSOCIATE	16.40	789.00	\$12,939.60
ELLIOT STEVENS	ASSOCIATE	0.50	789.00	\$394.50
JOSHUA A. ESSES	ASSOCIATE	75.20	789.00	\$59,332.80
KELLY M. CURTIS	ASSOCIATE	21.30	789.00	\$16,805.70
LAURA STAFFORD	ASSOCIATE	0.50	789.00	\$394.50
MATTHEW A. SKRZYNSKI	ASSOCIATE	17.30	789.00	\$13,649.70
MEE R. KIM	ASSOCIATE	141.80	789.00	\$111,880.20
MEGAN R. VOLIN	ASSOCIATE	11.30	789.00	\$8,915.70
RUSSELL T. GORKIN	ASSOCIATE	10.80	789.00	\$8,521.20
WILLIAM D. DALSEN	ASSOCIATE	70.10	789.00	\$55,308.90
Total for ASSOCIATE		386.90		\$305,264.10
ANGELO MONFORTE	LEGAL ASSISTANT	1.80	270.00	\$486.00
CHARLES H. KING	LEGAL ASSISTANT	3.50	270.00	\$945.00
DENNIS T. MCPECK	LEGAL ASSISTANT	11.10	270.00	\$2,997.00
JOAN K. HOFFMAN	LEGAL ASSISTANT	92.70	270.00	\$25,029.00
JULIA L. SUTHERLAND	LEGAL ASSISTANT	19.80	270.00	\$5,346.00
LAURA M. GEARY	LEGAL ASSISTANT	24.70	270.00	\$6,669.00
LAWRENCE T. SILVESTRO	LEGAL ASSISTANT	73.20	270.00	\$19,764.00
LELA LERNER	LEGAL ASSISTANT	5.00	270.00	\$1,350.00
NATASHA PETROV	LEGAL ASSISTANT	7.30	270.00	\$1,971.00
OLAIDE M. ADEJOBI	LEGAL ASSISTANT	18.60	270.00	\$5,022.00
SHEALEEN E. SCHAEFER	LEGAL ASSISTANT	117.30	270.00	\$31,671.00
TAL J. SINGER	LEGAL ASSISTANT	1.90	270.00	\$513.00
Total for LEGAL ASSISTANT		376.90		\$101,763.00
ERIC R. CHERNUS	PRAC. SUPPORT	12.40	270.00	\$3,348.00
Total for PRAC. SUPPORT		12.40		\$3,348.00
Total		1,329.30		\$846,771.00

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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For Charges and Disbursements

Date	Timekeeper	Type	Description	Amount
07/02/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$0.60
07/02/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$5.10
07/02/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$4.00
07/02/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$48.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$4.50
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$5.90
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.50
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.40
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$4.90
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$5.70
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.30
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.30
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$2.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$5.90
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$5.80
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$4.50
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.30
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.30
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$4.00
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$19.50
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$5.50
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.90
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$1.70
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$6.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$4.90
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$2.40
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.30
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.40
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$2.30
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$4.60
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.30
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$4.70
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$5.50

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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Date	Timekeeper	Type	Description	Amount
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$5.70
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$5.60
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$4.30
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$3.80
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$19.30
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$0.20
07/02/2020	Margaret A. Dale	REPRODUCTION	REPRODUCTION	\$2.00
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$0.10
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$3.80
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$0.30
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$4.40
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$14.30
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$2.80
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$12.30
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$0.60
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$7.10
07/22/2020	Mee R. Kim	REPRODUCTION	REPRODUCTION	\$1.10
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$0.10
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$0.10
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$0.10
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$17.10
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$0.90
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$11.80
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$1.50
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$0.20
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$7.40
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$1.10
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$4.50
07/23/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$0.30
Total for REPRODUCTION				\$299.60

Date	Timekeeper	Type	Description	Amount
07/05/2020	Joan K. Hoffman	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$289.00
07/07/2020	Joan K. Hoffman	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$53.00
07/11/2020	Ehud Barak	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$297.00
07/13/2020	Elliot Stevens	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$99.00
07/20/2020	Rachael Hope Moller	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$155.00
07/20/2020	Lawrence T. Silvestro	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$495.00

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

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Total for LEXIS**\$1,388.00**

Date	Timekeeper	Type	Description	Amount
06/28/2020	Kelly M. Curtis	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 19 Lines Printed	\$1,144.00
06/30/2020	Elisa Carino	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 59 Lines Printed	\$931.00
06/30/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 15 Lines Printed	\$143.00
06/30/2020	Judy Lavine	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 98 Lines Printed	\$143.00
07/01/2020	Dennis T. McPeck	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 7 Lines Printed	\$143.00
07/01/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 2 Lines Printed	\$143.00
07/02/2020	Kelly M. Curtis	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 20 Lines Printed	\$1,001.00
07/04/2020	Joan K. Hoffman	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 55 Lines Printed	\$1,431.00
07/05/2020	Joan K. Hoffman	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 11 Lines Printed	\$244.00
07/07/2020	Joan K. Hoffman	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 21 Lines Printed	\$143.00
07/07/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 6 Lines Printed	\$143.00
07/08/2020	Joan K. Hoffman	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 24 Lines Printed	\$286.00
07/08/2020	Tal J. Singer	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 2 Lines Printed	\$286.00
07/08/2020	Kelly M. Curtis	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 8 Lines Printed	\$143.00
07/09/2020	Kelly M. Curtis	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 6 Lines Printed	\$143.00
07/13/2020	Joshua A. Esses	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 3 Lines Printed	\$143.00
07/13/2020	Kelly M. Curtis	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 11 Lines Printed	\$286.00

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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Date	Timekeeper	Type	Description	Amount
07/14/2020	Kelly M. Curtis	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 19 Lines Printed	\$143.00
07/15/2020	Lawrence T. Silvestro	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 10 Lines Printed	\$143.00
07/15/2020	Elisa Carino	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 3 Lines Printed	\$143.00
07/18/2020	Lela Lerner	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 47 Lines Printed	\$715.00
07/20/2020	Lawrence T. Silvestro	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 16 Lines Printed	\$938.00
07/20/2020	Shealeen E. Schaefer	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 4 Lines Printed	\$286.00
07/20/2020	Dennis T. McPeck	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 2 Lines Printed	\$180.00
07/21/2020	Laura M. Geary	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 31 Lines Printed	\$143.00
07/21/2020	Joshua A. Esses	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 17 Lines Printed	\$408.00
07/22/2020	Laura M. Geary	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 5 Lines Printed	\$265.00
			Total for WESTLAW	\$10,260.00

Date	Timekeeper	Type	Description	Amount
05/28/2020	Martin J. Bienenstock	HIGHQ LICENSING	HIGHQ LICENSING - ERS Lien Scope - M. Rina Kim - SHEALEEN Schaefer - 02/04/2020 09:09:38 PM	\$185.00
06/26/2020	Martin J. Bienenstock	HIGHQ LICENSING	HIGHQ LICENSING - ERS Lien Scope - M. Rina Kim - Shealeen Schaefer - 02/04/2020 09:09:38 PM	\$185.00
			Total for HIGHQ LICENSING	\$370.00

Date	Timekeeper	Type	Description	Amount
03/10/2020	Mee R. Kim	OUT OF TOWN MEALS	OUT OF TOWN MEALS Meals Dinner - Mee (Rina) Kim Dinner on travel day for trip to Puerto Rico for ERS meetings Mee (Rina) Kim	\$40.00
03/11/2020	Mee R. Kim	OUT OF TOWN MEALS	OUT OF TOWN MEALS Meals Dinner - Mee (Rina) Kim Dinner for travel day after meeting at ERS Mee (Rina) Kim	\$40.00
			Total for OUT OF TOWN MEALS	\$80.00

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD
MEMBER

0007 PROMESA TITLE III: ERS

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Date	Timekeeper	Type	Description	Amount
07/27/2020	William D. Dalsen	DATA BASE SEARCH SERV.	DATA BASE SEARCH SERV. - - VENDOR: NEW YORK LAW INSTITUTE INC - INV# 18015 - Total for DATA BASE SEARCH SERV.	\$20.00 \$20.00

Charges and Disbursements Summary

Type of Disbursements	Amount
REPRODUCTION	299.60
LEXIS	1,388.00
WESTLAW	10,260.00
HIGHQ LICENSING	370.00
OUT OF TOWN MEALS	80.00
DATA BASE SEARCH SERV.	20.00
Total Expenses	\$12,417.60
Total Amount for this Matter	\$859,188.60

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0048 ERS TITLE III - MISCELLANEOUS

Page 1

Summary of Time Billed by Task		Hours	Value
219	Appeal	3.60	\$2,840.40
Total		3.60	\$2,840.40

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0048 ERS TITLE III - MISCELLANEOUS

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Appeal -- 219

Date	Timekeeper	Task	Description	Hours	Amount
07/31/20	Jeffrey W. Levitan	219	Andalusian: Review certiorari petition regarding 552 decision.	1.20	\$946.80
07/31/20	William D. Dalsen	219	Andalusian: Review ERS Bondholders' petition for certiorari seeking review of Section 552 decision (0.40).	0.40	\$315.60
07/31/20	Timothy W. Mungovan	219	Andalusian: Review of petition for writ of certiorari by Andalusian (0.40).	0.40	\$315.60
07/31/20	Michael R. Hackett	219	Andalusian: Review petition for certiorari filed by ERS Bondholders (0.80); Review underlying decision by First Circuit (0.60).	1.40	\$1,104.60
07/31/20	Timothy W. Mungovan	219	Andalusian: E-mails with M. Harris and W. Dalsen regarding petition for writ of certiorari by Andalusian (0.20).	0.20	\$157.80
Appeal				3.60	\$2,840.40
Total for Professional Services					\$2,840.40

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD
MEMBER

0048 ERS TITLE III - MISCELLANEOUS

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Timekeeper Summary

Timekeeper	Status	Hours	Rate	Value
JEFFREY W. LEVITAN	PARTNER	1.20	789.00	\$946.80
MICHAEL R. HACKETT	PARTNER	1.40	789.00	\$1,104.60
TIMOTHY W. MUNGOVAN	PARTNER	0.60	789.00	\$473.40
Total for PARTNER		3.20		\$2,524.80
WILLIAM D. DALSEN	ASSOCIATE	0.40	789.00	\$315.60
Total for ASSOCIATE		0.40		\$315.60
		Total	3.60	\$2,840.40
		Total Amount for this Matter		\$2,840.40

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

-----X

In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

-----X

IN RE:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3566-LTS

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO,

Debtor.

-----X

**COVER SHEET TO FORTY-FIRST MONTHLY FEE APPLICATION OF PROSKAUER
ROSE LLP AS ATTORNEYS TO THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, AS REPRESENTATIVE OF DEBTOR, EMPLOYEES
RETIREMENT SYSTEM (“ERS”)
FOR THE PERIOD AUGUST 1, 2020 THROUGH AUGUST 31, 2020**

Name of Applicant:

Proskauer Rose LLP (“Proskauer”)

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Authorized to Provide
Professional Services to:

Financial Oversight and Management Board, as
Representative for the Debtor Pursuant to
PROMESA Section 315(b)

Period for which compensation
and reimbursement for fees and services
is sought:

August 1, 2020 through August 31, 2020

Amount of compensation sought
as actual, reasonable and necessary:

\$683,806.80

Amount of expense reimbursement sought
as actual, reasonable and necessary:

\$13,451.49

Total Amount for these Invoices:

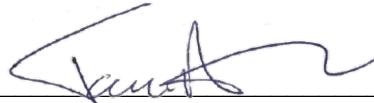
\$697,258.29

This is a: X monthly ___ interim ___ final application.

This is Proskauer's 41st monthly fee application in these cases.

Principal Certification

I hereby authorize the submission of this Monthly Fee Statement for August 2020.

A handwritten signature in dark ink, appearing to read 'Jaime A. El Koury', is positioned above a horizontal line.

Jaime A. El Koury
General Counsel to the Financial Oversight and
Management Board for Puerto Rico

On September 10, 2020 sent to:

FOMB:

Financial Oversight and Management Board
40 Washington Square South
Office 314A
New York, NY 10012
Attn: Professor Arthur J. Gonzalez
FOMB Board Member

O'Neill & Borges LLC
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Office of United States Trustee

Office of the United States Trustee for the District of
Puerto Rico
Edificio Ochoa, 500 Tanca Street, Suite 301
San Juan, PR 00901
(In re: Commonwealth of Puerto Rico)

Office of the United States Trustee for Region 21
75 Spring Street, SW, Room 362
Atlanta, GA 30303
Attn: Guy G. Gebhardt
Acting United States Trustee (Region 21)
(In re: Commonwealth of Puerto Rico)

**Co-Counsel for the Official Committee of Unsecured
Creditors:**

Paul Hastings LLP
200 Park Avenue
New York, NY 10166
Attn: Luc. A. Despins, Esq.

Casillas, Santiago & Torres, LLC
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San Juan, Puerto Rico 00901-2419
Attn: Juan J. Casillas Ayala, Esq.
Alberto J. E. Añeses Negrón, Esq.

Co-Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
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Attn: Katherine Stadler

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Attn: Eyck O. Lugo

Co-Counsel for AAFAF:

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Suzanne Uhland, Esq.
Diana M. Perez, Esq.

Marini Pietrantonio Muñiz LLC
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Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero, Esq.

Co-Counsel for the Official Committee of Retirees:

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Attn.: Robert Gordon, Esq.
Richard Levin, Esq.

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Chicago, IL 60654
Attn.: Catherine Steege, Esq.
Melissa Root, Esq.

Bennazar, García & Milián, C.S.P.
Edificio Union Plaza, PH-A
416 Avenida Ponce de León
Hato Rey, PR 00918
Attn.: A.J. Bennazar-Zequeira, Esq.

Puerto Rico Department of Treasury

PO Box 9024140
San Juan, PR 00902-4140
Attn: Reylam Guerra Goderich, Deputy Assistant of
Central Accounting
Omar E. Rodríguez Pérez, CPA, Assistant
Secretary of Central Accounting
Angel L. Pantoja Rodríguez, Deputy Assistant of
Internal Revenue and Tax Policy
Francisco Parés Alicea, Assistant Secretary of
Internal Revenue and Tax Policy
Francisco Peña Montañez, CPA, Assistant
Secretary of the Treasury

Summary of Legal Fees for the Period August 2020

ERS – General			
Task Code	Matter Description	Total Billed Hours	Total Fees Requested
202	Legal Research	18.40	\$14,517.60
206	Documents Filed on Behalf of the Board	232.10	\$183,126.90
208	Stay Matters	1.10	\$867.90
210	Analysis and Strategy	472.70	\$372,960.30
212	General Administration	191.20	\$51,624.00
218	Employment and Fee Applications	9.50	\$3,966.30
219	Appeal	5.00	\$3,945.00
Total		930.00	\$631,008.00

ERS – Miscellaneous			
Task Code	Matter Description	Total Billed Hours	Total Fees Requested
212	General Administration	2.10	\$567.00
219	Appeal	66.20	\$52,231.80
Total		68.30	\$52,798.80

Summary of Legal Fees for the Period August 2020

ACROSS ALL ERS-RELATED MATTERS

Professional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Brian S. Rosen	Partner	BSGR & B	\$789.00	2.90	\$2,288.10
Ehud Barak	Partner	BSGR & B	\$789.00	5.00	\$3,945.00
Jeffrey W. Levitan	Partner	BSGR & B	\$789.00	89.70	\$70,773.30
John E. Roberts	Partner	Litigation	\$789.00	18.40	\$14,517.60
Kevin J. Perra	Partner	Litigation	\$789.00	1.60	\$1,262.40
Margaret A. Dale	Partner	Litigation	\$789.00	78.20	\$61,699.80
Mark Harris	Partner	Litigation	\$789.00	4.20	\$3,313.80
Ron D. Franklin	Partner	Corporate	\$789.00	0.50	\$394.50
Steven O. Weise	Partner	Corporate	\$789.00	118.40	\$93,417.60
Timothy W. Mungovan	Partner	Litigation	\$789.00	0.80	\$631.20
Jennifer L. Roche	Senior Counsel	Litigation	\$789.00	86.50	\$68,248.50
Adam L. Deming	Associate	Litigation	\$789.00	23.70	\$18,699.30
Ariella Muller	Associate	Litigation	\$789.00	35.70	\$28,167.30
Elisa Carino	Associate	Litigation	\$789.00	19.00	\$14,991.00
Joshua A. Esses	Associate	BSGR & B	\$789.00	13.10	\$10,335.90
Mee R. Kim	Associate	Litigation	\$789.00	213.40	\$168,372.60
Megan R. Volin	Associate	Corporate	\$789.00	2.70	\$2,130.30
William D. Dalsen	Associate	Litigation	\$789.00	84.40	\$66,591.60
TOTAL				798.20	\$629,779.80

Summary of Legal Fees for the Period August 2020

Paraprofessional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Angelo Monforte	Legal Assistant	Litigation	\$270.00	2.00	\$540.00
Eric R. Chernus	Practice Support	Professional Resources	\$270.00	0.30	\$81.00
Laurie A. Henderson	Lit. Support	Litigation	\$270.00	0.40	\$108.00
Lawrence T. Silvestro	Legal Assistant	Litigation	\$270.00	74.60	\$20,142.00
Lela Lerner	Legal Assistant	Litigation	\$270.00	0.70	\$189.00
Natasha Petrov	Legal Assistant	BSGR & B	\$270.00	6.80	\$1,836.00
Olaide M. Adejobi	Legal Assistant	Litigation	\$270.00	1.80	\$486.00
Shealeen E. Schaefer	Legal Assistant	Labor & Employment	\$270.00	113.50	\$30,645.00
TOTAL				200.10	\$54,027.00

SUMMARY OF LEGAL FEES	<u>Hours</u> 998.30	<u>Fees</u> \$683,806.80
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Summary of Disbursements for the period August 2020

ACROSS ALL ERS-RELATED MATTERS

EXPENSE CATEGORY	AMOUNTS
Highq Licensing	\$185.00
Lexis	\$845.00
Messenger/Delivery	\$136.22
Outside Reproduction	\$691.37
Reproduction	\$4.90
Westlaw	\$11,589.00
Total	\$13,451.49

Proskauer requests payment of fees and reimbursement of expenses in accordance with the procedures set forth in the Interim Compensation Order (*i.e.*, payment of ninety percent (90%) of the compensation sought, in the amount of \$615,426.12 and reimbursement of one-hundred percent (100%) of expenses incurred, in the amount of \$13,451.49) in the total amount of \$628,877.61.

Professional Certification

I hereby certify that no public servant of the Department of Treasury is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the authorized representatives of the Financial Oversight and Management Board for Puerto Rico. The amount of this invoice is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, Proskauer Rose LLP does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900

Exhibit A

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD
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Summary of Time Billed by Task		Hours	Value
202	Legal Research	18.40	\$14,517.60
206	Documents Filed on Behalf of the Board	232.10	\$183,126.90
208	Stay Matters	1.10	\$867.90
210	Analysis and Strategy	472.70	\$372,960.30
212	General Administration	191.20	\$51,624.00
218	Employment and Fee Applications	9.50	\$3,966.30
219	Appeal	5.00	\$3,945.00
Total		930.00	\$631,008.00

Legal Research -- 202

Date	Timekeeper	Task	Description	Hours	Amount
08/05/20	Ariella Muller	202	Call with R. Kim regarding expert research project (0.50); Review expert materials (0.60).	1.10	\$867.90
08/13/20	Ariella Muller	202	Review motion for summary judgment and create chart of all UCC cites (0.70); Research corresponding LPRA cites (3.00).	3.70	\$2,919.30
08/14/20	Ariella Muller	202	Research Puerto Rico cases analyzing security interest perfection issues (1.00); Research section of the Enabling Act pursuant to which employees contributed to ERS, and the section describing that employee contributions were deducted from paychecks (1.00).	2.00	\$1,578.00
08/17/20	Ariella Muller	202	Call with J. Roche and E. Carino to discuss next steps for motion for summary judgement (1.50); Research legal authority stating it is bondholders' burden to demonstrate they have a security interest (0.40).	1.90	\$1,499.10
08/23/20	Ariella Muller	202	Research case law regarding the right to receive and perfection of interests in connection with motion for summary judgement (1.40); Draft research memorandum in connection with same for J. Roche (1.00).	2.40	\$1,893.60
08/25/20	Ariella Muller	202	E-mail with W. Dalsen regarding research assignment on Court of Federal Claims intervention rules (0.20).	0.20	\$157.80
08/26/20	Ariella Muller	202	Research legal standard for intervention in Court of Federal Claims per W. Dalsen (1.70).	1.70	\$1,341.30
08/27/20	Ariella Muller	202	Research intervention under the Rules of the Court of Federal Claims (2.00); Analyze intervention strategies (1.10).	3.10	\$2,445.90
08/31/20	Ariella Muller	202	Research outstanding points in summary judgment motion regarding whether an agreement can expand the scope of proceeds as defined in Article 9 and that a secured interest only attaches to original collateral per J. Roche.	2.30	\$1,814.70
Legal Research				18.40	\$14,517.60

Documents Filed on Behalf of the Board -- 206

Date	Timekeeper	Task	Description	Hours	Amount
08/01/20	Jennifer L. Roche	206	Analyze and draft lien scope motion for summary judgment.	2.60	\$2,051.40
08/02/20	Jennifer L. Roche	206	Draft lien scope summary judgment brief (3.20); E-mail S. Weise regarding lien scope issues (0.10).	3.30	\$2,603.70
08/03/20	Jennifer L. Roche	206	Conference with M. Dale and ERS litigation team regarding strategy and status (0.40); E-mail E. Carino regarding statement of facts for lien scope summary judgment (0.10); E-mails with M. Dale, P. Possinger and J. Esses regarding estimated value of assets (0.20); Draft lien scope summary judgment (2.00).	2.70	\$2,130.30
08/04/20	Jennifer L. Roche	206	Draft lien scope summary judgment motion.	3.50	\$2,761.50
08/04/20	Ariella Muller	206	Draft notices of deposition.	0.80	\$631.20
08/05/20	Jennifer L. Roche	206	Draft lien scope summary judgment motion.	1.30	\$1,025.70
08/05/20	Elisa Carino	206	Revise draft statement of material facts for summary judgment motion.	0.40	\$315.60
08/06/20	Jennifer L. Roche	206	E-mails with W. Dalsen and Committee counsel regarding expert prep (0.10); Draft lien scope summary judgment motion (3.70).	3.80	\$2,998.20
08/07/20	Jennifer L. Roche	206	Conference with E. Carino regarding lien scope summary judgment tasks (0.20); Review summary of expert witness deposition (0.20); E-mails with W. Dalsen regarding same (0.10).	0.50	\$394.50
08/07/20	Joshua A. Esses	206	Review lien scope draft summary judgment motion.	0.10	\$78.90
08/07/20	Elisa Carino	206	Conference with J. Roche about draft motion for summary judgment.	0.20	\$157.80
08/08/20	Jeffrey W. Levitan	206	Review and comment on lien scope summary judgment brief (1.40); Review summary of Spanish-language expert, e-mail W. Dalsen regarding 12(c) reply (0.20); Teleconference J. Roche regarding summary judgment submissions (0.20).	1.80	\$1,420.20
08/09/20	Jennifer L. Roche	206	Analysis regarding separate statement in support of lien scope summary judgment motion.	1.50	\$1,183.50
08/09/20	Ariella Muller	206	Review motion for summary judgement (0.20).	0.20	\$157.80

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Date	Timekeeper	Task	Description	Hours	Amount
08/10/20	Ariella Muller	206	Call with J. Roche and E. Carino to discuss open fact issues in motion for summary judgement (0.50); Call with E. Carino to discuss work allocation and how to find relevant fact information (0.60).	1.10	\$867.90
08/10/20	Elisa Carino	206	Conference with S. Schaeffer and L. Silvestro regarding exhibits for summary judgment motion (0.30); Conference with J. Roche and A. Muller regarding revisions to motion for summary judgment (0.50); Conference with A. Muller regarding revisions to statement of material facts and research (0.60).	1.40	\$1,104.60
08/10/20	Jennifer L. Roche	206	Review Hildreth transcript (0.60); Analyze and revise separate statement in support of lien scope summary judgment motion (2.60); Conference with E. Carino and A. Muller regarding lien scope motion issues (0.50); E-mails with W. Dalsen and M. Dale regarding lien scope motion (0.10).	3.80	\$2,998.20
08/11/20	Jennifer L. Roche	206	Conference with J. Levitan regarding lien scope summary judgment motion (0.20); Review Doty expert deposition transcript (1.10); E-mail with W. Dalsen regarding expert admission (0.10).	1.40	\$1,104.60
08/11/20	Ariella Muller	206	Research additional factual support to include in separate statement of facts to accompany motion of summary judgement (1.30); Review deposition testimony and expert reports for relevant facts (3.00).	4.30	\$3,392.70
08/12/20	Ariella Muller	206	Call with E. Carino to discuss additional edits needed on separate statement of facts to motion for summary judgement (0.50); Revise separate statement to include additional cites (0.40).	0.90	\$710.10
08/12/20	Elisa Carino	206	Conduct legal and factual research to update draft statement of facts (4.60); Conference with A. Muller regarding same (0.50); Review and revise draft of proposed stipulated facts (0.60).	5.70	\$4,497.30
08/12/20	Jennifer L. Roche	206	Review proposed edits to lien scope summary judgment motion (0.30); E-mails with J. Levitan and S. Weise regarding same (0.10); E-mail with E. Carino and A. Mueller regarding research for lien scope motion (0.10); Review revised separate statement of facts (0.20); E-mail R. Kim regarding factual issues in summary judgment motion (0.10).	0.80	\$631.20

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Date	Timekeeper	Task	Description	Hours	Amount
08/12/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	3.70	\$2,919.30
08/13/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	2.70	\$2,130.30
08/13/20	Jennifer L. Roche	206	Conference with J. Levitan regarding lien scope summary judgment motion (0.10); E-mails with S. Weise regarding draft motion (0.10); Conference with M. Dale regarding ERS discovery issues and summary judgment (0.50); Revise separate statement of facts (2.20); Revise summary judgment motion (1.00); E-mail E. Carino and A. Muller regarding lien scope research issues (0.10).	4.00	\$3,156.00
08/14/20	Jennifer L. Roche	206	Analyze and revise lien scope summary judgment motion (4.80); E-mail S. Weise regarding proposed edits (0.10); Conference with J. Levitan regarding proposed edits (0.20).	5.10	\$4,023.90
08/15/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	5.20	\$4,102.80
08/15/20	Jeffrey W. Levitan	206	Review revise summary judgment brief (1.20); Teleconference M. Dale, e-mails J. Esses, S. Weise, M. Dale regarding summary judgment brief (0.40).	1.60	\$1,262.40
08/15/20	Jennifer L. Roche	206	Analysis and e-mails with W. Dalsen, M. Dale and R. Kim regarding flow of funds issues (0.40); Revise lien scope summary judgment (1.80).	2.20	\$1,735.80
08/15/20	Elisa Carino	206	Conduct legal and factual research to assist J. Roche update draft statement of material facts.	6.30	\$4,970.70
08/15/20	Joshua A. Esses	206	Revise lien-scope summary judgment motion.	1.80	\$1,420.20
08/16/20	Jennifer L. Roche	206	Analysis regarding research on lien scope issues (0.20); E-mail with E. Carino regarding additional lien scope research (0.10); E-mails with J. Levitan, S. Weise, W. Dalsen and M. Dale regarding lien scope summary judgment (0.20); Analysis regarding proposed edits to lien scope summary judgment brief (0.40); Revise brief (1.00).	1.90	\$1,499.10
08/16/20	William D. Dalsen	206	Review draft brief in support of motion for summary judgment on lien scope issues (1.90).	1.90	\$1,499.10
08/16/20	Margaret A. Dale	206	Review and revise draft motion for summary judgment regarding lien scope issues (3.80); E-mails with J. Levitan, S. Weise, J. Roche, W. Dalsen and R. Kim regarding lien scope motion for summary judgment (0.50).	4.30	\$3,392.70

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Date	Timekeeper	Task	Description	Hours	Amount
08/16/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	3.70	\$2,919.30
08/16/20	Jeffrey W. Levitan	206	Review comments to lien scope summary judgment brief (0.50); E-mails with W. Dalsen, M. Dale regarding lien scope brief (0.20); Revise lien scope summary judgment brief (4.20).	4.90	\$3,866.10
08/17/20	Jennifer L. Roche	206	Conference with M. Dale, J. Levitan, J. Esses, W. Dalsen, R. Kim regarding lien scope summary judgment (1.50); Revise statement of facts (1.30); Analyze and revise lien scope brief (5.60); E-mails with M. Pocha regarding factual issues (0.20); E-mail with R. Kim regarding balances (0.10); E-mail A. Muller regarding burden of proof (0.10).	8.80	\$6,943.20
08/17/20	Elisa Carino	206	Conference (partial) with J. Roche, M. Dale, J. Levitan, S. Weise, R. Kim, W. Dalsen, A. Muller and J. Esses regarding revisions to motion for summary judgment.	0.80	\$631.20
08/17/20	Jeffrey W. Levitan	206	Review Brooks decision (0.50); E-mail S. Weise regarding revisions to lien scope brief (0.20); Review comments to brief (0.40); E-mail E. Barak regarding brief (0.10); Review agenda for team call and e-mails from team (0.20); Participate in call with J. Roche and regarding drafting issues and strategy (1.50); Review summary of Hildreth deposition (0.30).	3.20	\$2,524.80
08/17/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues (1.20); Confer with J. Roche, J. Levitan, M. Dale, and team regarding lien scope summary judgment (1.50).	2.70	\$2,130.30
08/17/20	Joshua A. Esses	206	Call with J. Roche and team on lien scope summary judgment motion.	1.50	\$1,183.50
08/18/20	Joshua A. Esses	206	Draft lien scope summary judgment motion.	0.40	\$315.60
08/18/20	Jeffrey W. Levitan	206	Revise lien scope summary judgment brief (4.20); E-mails J. Roche, S. Weise regarding revisions to brief (0.50).	4.70	\$3,708.30

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Date	Timekeeper	Task	Description	Hours	Amount
08/18/20	Jennifer L. Roche	206	Analysis regarding proposed stipulation of facts (1.50); Analysis regarding lien scope summary judgment issues (0.30); Analysis regarding proposed edits to summary judgment motion (0.30); E-mails with W. Dalsen and M. Dale regarding potential change to schedule (0.10); Analysis regarding account ownership and related documents (0.40); E-mails with R. Kim and S. Weise regarding same (0.20); E-mails with R. Kim and M. Dale regarding account balances (0.10); E-mails with J. Esses, J. Levitan and S. Weise regarding revision to brief (0.10).	3.00	\$2,367.00
08/18/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	5.70	\$4,497.30
08/18/20	Elisa Carino	206	Conference with S. Schaeffer about motion for summary judgment and exhibits (0.40); Conference with A. Muller regarding revisions to statement of material facts (0.50); Conference with A. Muller regarding same (0.20).	1.10	\$867.90
08/18/20	William D. Dalsen	206	Review draft statement of facts in support of motion for summary judgment (0.50); Review draft brief in support of motion for summary judgment (0.70).	1.20	\$946.80
08/18/20	Ariella Muller	206	Call with E. Carino to discuss outstanding tasks with respect to the summary judgement motion (0.50); Call with E. Carino to discuss work allocation (0.20); Confer with paralegals to discuss notice of motion and proposed order (0.10).	0.80	\$631.20
08/19/20	Ariella Muller	206	Draft notice of motion and proposed order for motion of summary judgement.	0.50	\$394.50
08/19/20	Elisa Carino	206	Call with S. Schaeffer about document review to update evidence in motion for summary judgment.	0.10	\$78.90
08/19/20	Jennifer L. Roche	206	Conference with J. Levitan and S. Weise regarding lien scope summary judgment brief (1.10); Follow-up conference and e-mails with J. Levitan (0.20); Revise summary judgment brief (5.90); Analysis regarding brief scheduling issues (0.10); E-mails with W. Dalsen and Committee counsel regarding proposed schedule (0.10); Review proposed edits to statement of facts (0.20).	7.60	\$5,996.40

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Date	Timekeeper	Task	Description	Hours	Amount
08/19/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues (1.10); Confer with J. Levitan and J. Roche regarding same (1.10).	2.20	\$1,735.80
08/19/20	Jeffrey W. Levitan	206	Review S. Weise comments to lien scope summary judgment brief (1.20); Review draft statement of undisputed facts (0.30); Teleconference S. Weise, J. Roche regarding revisions to lien scope brief (1.10); E-mail J. Roche regarding additional revisions to brief (0.50); E-mails W. Dalsen regarding Court of Claims action (0.20); Review proposed briefing schedule (0.10); E-mails W. Dalsen regarding proposed briefing schedule (0.50); Teleconference M. Dale, e-mails B. Rosen and team regarding briefing schedule (0.30).	4.20	\$3,313.80
08/19/20	Margaret A. Dale	206	Review and revise draft of stipulated facts in support of summary judgment motion (1.00); Teleconference with J. Levitan regarding scheduling issues and summary judgment motion (0.20).	1.20	\$946.80
08/20/20	Jennifer L. Roche	206	Conference with J. Levitan regarding lien scope summary judgment brief (0.10); E-mails and conference with R. Kim regarding lien scope issues (0.50); Revise summary judgment brief (5.50).	6.10	\$4,812.90
08/20/20	Ariella Muller	206	Review deposition testimony for relevant facts to support arguments in motion for summary judgement.	1.60	\$1,262.40
08/21/20	Ariella Muller	206	Draft motion to modify schedule (1.40).	1.40	\$1,104.60
08/21/20	Jennifer L. Roche	206	Review proposed edits to lien scope summary judgment motion (0.20); E-mails with J. Levitan regarding summary judgment strategy (0.10); E-mails with A. Muller regarding research issues for summary judgment (0.10); E-mails with W. Dalsen regarding summary judgment scheduling issues (0.10); E-mails with W. Dalsen and Committee counsel regarding summary judgment briefing (0.10).	0.60	\$473.40
08/21/20	Jeffrey W. Levitan	206	Edit lien scope summary judgment brief (4.10); E-mails S. Weise, J. Roche regarding revisions to brief (0.50); E-mails W. Dalsen regarding schedule (0.20); Teleconference P. Friedman and team regarding Court of Claims action (0.50).	5.30	\$4,181.70
08/21/20	Steven O. Weise	206	Review draft brief on lien scope, tracing and perfection issues.	3.80	\$2,998.20
08/22/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	1.40	\$1,104.60

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Date	Timekeeper	Task	Description	Hours	Amount
08/22/20	Ariella Muller	206	Draft joint motion to modify schedule (0.30).	0.30	\$236.70
08/23/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	1.60	\$1,262.40
08/23/20	Jennifer L. Roche	206	Analysis regarding authorities on lien scope issues (0.50); E-mails with A. Muller regarding same (0.10); Analysis regarding documents concerning ERS accounts (0.30); E-mail E. Carino regarding same (0.10); Revise draft stipulation of fact (1.00).	2.00	\$1,578.00
08/23/20	William D. Dalsen	206	Revise draft motion to modify briefing schedule in lien scope and ultra vires proceedings (1.10).	1.10	\$867.90
08/24/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	5.80	\$4,576.20
08/25/20	Jeffrey W. Levitan	206	Review revisions to lien scope summary judgment brief (0.90); E-mails S. Weise, M. Dale, R. Kim regarding revisions to brief (0.50); Review drafts of funds flow chart, e-mails M. Dale (0.50).	1.90	\$1,499.10
08/25/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	3.40	\$2,682.60
08/25/20	Jennifer L. Roche	206	Revise lien scope summary judgment brief (2.20); E-mails with M. Dale, R. Kim, S. Weise and J. Levitan regarding lien scope issues (0.20).	2.40	\$1,893.60
08/26/20	Jeffrey W. Levitan	206	Teleconferences and e-mails R. Kim regarding revisions to brief (0.50); Teleconferences J. Esses, M. Dale regarding lien scope summary judgment brief (0.50); E-mails with S. Weise regarding lien scope (0.20); Edit summary judgment brief (3.90).	5.10	\$4,023.90
08/26/20	Steven O. Weise	206	Review draft brief on tracing and perfection issues.	3.70	\$2,919.30
08/26/20	Jennifer L. Roche	206	Draft and revise separate statement in support of lien scope summary judgment (1.70); Conference with J. Levitan regarding same (0.10).	1.80	\$1,420.20
08/26/20	Joshua A. Esses	206	Draft summary judgment motion for lien scope adversary.	0.60	\$473.40
08/27/20	Joshua A. Esses	206	Draft lien scope summary judgment motion.	2.80	\$2,209.20
08/27/20	Steven O. Weise	206	Review revised draft brief on tracing and perfection issues and related statement of facts.	3.80	\$2,998.20

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Date	Timekeeper	Task	Description	Hours	Amount
08/27/20	Jennifer L. Roche	206	Analyze and revise separate statement in support of lien scope summary judgment (2.30); Review and revise draft brief (0.90); Analysis regarding release argument (0.20); E-mails with J. Levitan, J. Esses and S. Weise regarding argument (0.20).	3.60	\$2,840.40
08/27/20	Jeffrey W. Levitan	206	E-mails with A. Muller, W. Dalsen regarding Court of Claims research (0.20); E-mails with J. Esses regarding lien scope brief (0.50); E-mails with M. Dale, J. Roche regarding summary judgment brief (0.30); Review Pompeo correspondence regarding discovery, e-mails with W. Dalsen regarding same (0.30); Review statement of undisputed facts (0.70); Review revised summary judgment brief (0.90); Review and consider issues in agenda for team call regarding lien scope (0.20).	3.10	\$2,445.90
08/28/20	Jeffrey W. Levitan	206	Review, note comments on revised lien scope brief (1.40); Participate in call with J. Roche and team regarding lien scope brief and statement of undisputed facts (1.70); Review draft ultra vires summary judgment brief (1.30).	4.40	\$3,471.60
08/28/20	Steven O. Weise	206	Review revised draft brief on tracing and perfection issues and related statement of facts (2.20); Conference with M. Dale and team regarding same (1.20).	3.40	\$2,682.60
08/29/20	Jeffrey W. Levitan	206	Review R. Kim comments to summary judgment brief, e-mails with S. Weise, J. Roche regarding brief (0.50); Edit summary judgment brief (4.10).	4.60	\$3,629.40
08/30/20	Jeffrey W. Levitan	206	Review revised lien scope brief (0.70); Review team comments to revised brief (0.40); E-mail J. Esses regarding brief (0.10).	1.20	\$946.80
08/30/20	Steven O. Weise	206	Review revised draft brief on tracing and perfection issues and related statement of facts.	3.70	\$2,919.30
08/31/20	Ehud Barak	206	Review and revise the ERS lien scope challenge (2.40); Discuss same with J. Levitan (0.30); Participate in part on a call with ERS team (0.80).	3.50	\$2,761.50
08/31/20	Joshua A. Esses	206	Call with J. Roche and team on lien scope summary judgment motion.	0.70	\$552.30
08/31/20	Steven O. Weise	206	Review revised draft brief on tracing and perfection issues and related statement of facts (5.30); Conference with J. Roche and team regarding same (1.00).	6.30	\$4,970.70
Documents Filed on Behalf of the Board				232.10	\$183,126.90

Stay Matters -- 208

Date	Timekeeper	Task	Description	Hours	Amount
08/05/20	Margaret A. Dale	208	Conference call with B. Rosen, J. Levitan, P. Friedman, M. Pocha and W. Dalsen regarding bondholders' amended complaint in the Court of Claims (0.40); E-mails with J. Roche regarding lien scope summary judgment (0.20); E-mails with R. Kim regarding questions for ERS/Brattle in preparation for depositions (0.50).	1.10	\$867.90
Stay Matters				1.10	\$867.90

Analysis and Strategy -- 210

Date	Timekeeper	Task	Description	Hours	Amount
08/01/20	Mee R. Kim	210	E-mails with Brattle team regarding expert strategy (0.30); E-mails with M. Dale regarding same (0.10); Revise memorandum regarding same (6.00).	6.40	\$5,049.60
08/01/20	William D. Dalsen	210	Correspondence with M. Dale regarding Court of Federal Claims case (0.10).	0.10	\$78.90
08/02/20	Mee R. Kim	210	Review expert deposition strategy (6.70).	6.70	\$5,286.30
08/03/20	Mee R. Kim	210	Videoconference with M. Dale and Proskauer litigation team regarding weekly conference (0.40); E-mails with M. Dale and Proskauer team regarding litigation strategy (1.10); Videoconference with M. Dale regarding same (1.30); E-mails with M. Dale regarding same (0.20); Review memoranda regarding expert strategy (5.80).	8.80	\$6,943.20
08/03/20	Margaret A. Dale	210	Participate in weekly meeting with W. Dalsen and litigation team to go over work, deadlines, strategy (0.40); Conference call with R. Kim regarding expert deposition issues (1.30).	1.70	\$1,341.30
08/03/20	William D. Dalsen	210	Participate in weekly team call with M. Dale regarding ERS lien-scope and ultra-vires proceedings (0.40); Correspondence with counsel to ERS bondholders regarding Gonzalez deposition (0.10).	0.50	\$394.50

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Date	Timekeeper	Task	Description	Hours	Amount
08/03/20	Jeffrey W. Levitan	210	Review JNL funding decision on UCC Issues (0.90); E-mails J. Roche regarding decision, e-mail R. Kim regarding receivables, e-mail W. Dalsen regarding 12(c), review deposition notices (0.50).	1.40	\$1,104.60
08/03/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	4.20	\$3,313.80
08/03/20	Joshua A. Esses	210	Review Board communications on ERS developments (0.20); Review Court of claims ERS bondholder filing (0.70).	0.90	\$710.10
08/03/20	Ariella Muller	210	Participate in ERS team meeting with M. Dale regarding litigation strategy.	0.40	\$315.60
08/03/20	Elisa Carino	210	Phone call regarding status of litigation with M. Dale, J. Roche, W. Dalsen, and A. Muller.	0.40	\$315.60
08/04/20	Jeffrey W. Levitan	210	Teleconference M. Dale regarding lien scope (0.40); Review deposition schedule (0.10); Review e-mails and documents regarding Argiz rebuttal (0.40); E-mail M. Harris regarding 552 (0.10); Review summary judgment brief regarding lien scope (0.40).	1.40	\$1,104.60
08/04/20	Mee R. Kim	210	Revise memorandum regarding litigation strategy (7.70); E-mails with M. Dale regarding same (0.20); E-mails with M. Dale and Proskauer team regarding same (0.60); E-mails with Brattle team regarding same (0.20); E-mails with J. Esses regarding same (0.20); Teleconference with J. Esses regarding same (0.60).	9.50	\$7,495.50
08/04/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	4.40	\$3,471.60
08/04/20	William D. Dalsen	210	Correspondence with Court reporting agency regarding upcoming depositions (0.10); Revise draft notices of deposition to opposing experts (0.80); Correspondence with counsel to Retiree Committee regarding Gonzalez deposition (0.30); Correspondence with opposing counsel regarding expert depositions (0.40).	1.60	\$1,262.40
08/04/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding Court of Claims case, Ambac certiorari petition and expert depositions (0.40).	0.40	\$315.60
08/04/20	Brian S. Rosen	210	Review amended complaint in connection with Court of Claims matter (0.60); Memorandum to M. Dale, et al regarding Court call (0.20).	0.80	\$631.20

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Date	Timekeeper	Task	Description	Hours	Amount
08/05/20	Brian S. Rosen	210	Conference call and e-mails with AAFAF, M. Dale, J. Levitan, and W. Dalsen regarding Court of Claims complaint (0.50).	0.50	\$394.50
08/05/20	William D. Dalsen	210	Call with counsel to AAFAF, M. Dale, B. Rosen, and J. Levitan regarding Court of Federal Claims action (0.40); Correspondence with team regarding Court of Claims case (0.50).	0.90	\$710.10
08/05/20	Joshua A. Esses	210	Draft chart on bondholder outcomes per B. Rosen.	0.90	\$710.10
08/05/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding litigation strategy (1.00); E-mails with A. Muller and S. Schaefer regarding same (0.50); Teleconference with A. Muller regarding same (0.50); E-mails with M. Dale and Brattle team regarding same (0.60); E-mails with J. Esses regarding same (0.10); Draft memoranda regarding same (8.70).	11.40	\$8,994.60
08/05/20	Jeffrey W. Levitan	210	Review list of issues for Argiz deposition (0.60); E-mail R. Kim regarding discovery (0.10); Review analysis of possible litigation outcomes (0.60); E-mails with J. Esses, K. Perra regarding Court of Claims, litigation outcomes (0.20); Teleconference P. Friedman, B. Rosen, M. Dale, and W. Dalsen regarding Court of Claims case (0.40).	1.90	\$1,499.10
08/06/20	Jeffrey W. Levitan	210	E-mail J. Esses regarding litigation outcomes (0.10); Review draft of Hinton deposition outline (0.80).	0.90	\$710.10
08/06/20	Ariella Muller	210	Analyze bondholders' expert, A. Argiz's, prior testimony.	3.20	\$2,524.80
08/06/20	Margaret A. Dale	210	Review and revise outline for Hinton deposition preparation (1.00); E-mails with R. Kim regarding issues for Hinton preparation (0.50); Prepare for Hinton deposition preparation (2.50).	4.00	\$3,156.00
08/06/20	Steven O. Weise	210	Review issues regarding tracing of collateral.	1.70	\$1,341.30
08/06/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding litigation strategy (0.70); E-mails with M. Dale regarding same (0.90); E-mails with S. Schaefer regarding same (1.10); E-mails with M. Dale and O'Melveny team regarding same (0.30); E-mails with M. Dale and Brattle team regarding same (0.40); E-mails with J. Roche regarding same (0.10); Draft memoranda regarding same (11.20).	14.70	\$11,598.30

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Date	Timekeeper	Task	Description	Hours	Amount
08/07/20	Mee R. Kim	210	Prepare for videoconference with M. Dale, Proskauer team and Brattle team regarding litigation strategy (2.50); Videoconferences with M. Dale, Proskauer team and Brattle team regarding same (5.10); Videoconference with Brattle team regarding same (2.60); Teleconference with M. Dale regarding same (0.10); E-mails with M. Dale and Proskauer team regarding same (1.20); E-mails with M. Dale and O'Melveny team regarding same (0.30); E-mails with M. Dale regarding same (0.20); E-mails with W. Dalsen regarding same (0.30); E-mails with J. Esses regarding same (0.10); E-mails with M. Dale and Brattle team regarding same (0.30); E-mails with Brattle team regarding same (0.20); Revise memoranda regarding same (3.70); E-mails with M. Dale and L. Stafford regarding same (0.10); Attend part of L. Gonzalez deposition (1.50).	18.20	\$14,359.80
08/07/20	Brian S. Rosen	210	Review J. Esses chart of outcomes (0.40); Memorandum to J. Esses regarding same (0.10); Review J. Levitan Memorandum regarding same (0.20).	0.70	\$552.30
08/07/20	Steven O. Weise	210	Review rebuttal reports and prepare for depositions on tracing of collateral.	5.20	\$4,102.80
08/07/20	Ariella Muller	210	Analyze previous testimony of A. Argiz (0.80); Draft chart summarizing Argiz's previous testimony (1.00).	1.80	\$1,420.20
08/07/20	William D. Dalsen	210	Prepare for Hildreth expert deposition (0.30); Prepare for Gonzalez expert deposition (0.50); Participate in Doty deposition preparation meeting (2.00); Attend Gonzalez deposition (5.00); Review rough deposition transcript (0.30); Correspondence regarding Gonzalez expert deposition with team (0.30).	8.40	\$6,627.60
08/07/20	Jeffrey W. Levitan	210	Participate in call with P. Hinton and team to prepare for deposition (2.70); Review e-mails regarding bondholder information request (0.30); E-mail exchange J. Esses regarding settlement parameters (2.00); Review 12(c) reply (1.20).	6.20	\$4,891.80

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Date	Timekeeper	Task	Description	Hours	Amount
08/07/20	Margaret A. Dale	210	Prepare Paul Hinton for deposition (5.00); Review letter from ERS bondholders regarding Commonwealth spreadsheet related to amounts owed for EC (0.40); E-mails with R. Kim and L. Stafford regarding ERS bondholders' spreadsheet (0.30).	5.70	\$4,497.30
08/08/20	William D. Dalsen	210	Draft outline for Hildreth expert deposition (5.00); Call regarding preparation for Doty deposition (1.10); Call with R. Kim regarding expert depositions (0.80).	6.90	\$5,444.10
08/08/20	Margaret A. Dale	210	Review bondholder letter regarding employer contributions (0.20); Review outline for Hinton preparation (0.60).	0.80	\$631.20
08/08/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding litigation strategy (0.20); E-mails with Brattle team regarding same (0.20); Revise memorandum regarding same (7.40); E-mails with M. Dale, M. Pocha, and A. Mohan regarding same (0.20); Teleconference with W. Dalsen regarding same (0.80).	8.80	\$6,943.20
08/09/20	Mee R. Kim	210	E-mails with M. Dale regarding litigation strategy (0.60); E-mails with Brattle team regarding same (0.50); E-mails with M. Dale and Proskauer team regarding same (0.20); Revise memoranda regarding same (8.30); E-mails with M. Dale, M. Pocha, and A. Mohan regarding same (0.40); E-mail with W. Dalsen regarding same (0.10); Videoconference with O'Melveny, A. Vargas and ERS regarding same (1.40); E-mails with common interest counsel team regarding same (0.20); E-mails with litigation parties regarding deposition documents (0.10).	11.80	\$9,310.20
08/09/20	Margaret A. Dale	210	Review reply on Rule 12(c) motion (1.50); E-mails with J. Levitan and W. Dalsen regarding same (0.20); E-mails with R. Kim regarding Hinton prep (0.40).	2.10	\$1,656.90
08/09/20	Ron D. Franklin	210	Confer with W. Dalsen regarding bond issuance matters and review related materials.	0.50	\$394.50
08/09/20	William D. Dalsen	210	Prepare deposition outline and exhibits for expert deposition of W. Bartley Hildreth (10.00).	10.00	\$7,890.00
08/09/20	Jeffrey W. Levitan	210	Teleconference S. Weise, e-mail J. Roche regarding summary judgment, review e-mails regarding discovery, e-mail M. Dale regarding 12(c).	0.50	\$394.50

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Date	Timekeeper	Task	Description	Hours	Amount
08/10/20	William D. Dalsen	210	Final preparations for expert deposition of W. Bartley Hildreth (1.40); Take expert deposition of W. Bartley Hildreth (8.80); Review R. Doty potential deposition exhibits (0.30).	10.50	\$8,284.50
08/10/20	Steven O. Weise	210	Review rebuttal reports and prepare for depositions on tracing of collateral.	2.60	\$2,051.40
08/10/20	Margaret A. Dale	210	Prepare for deposition of expert P. Hinton with R. Kim and S. Weise (7.00); Teleconference with R. Kim regarding new table comparing Argiz Table 5 and Table 1 (0.30); Review revised table comparing Argiz Table 5 and Table 1 (0.30).	7.60	\$5,996.40
08/10/20	Mee R. Kim	210	E-mails with M. Dale, W. Dalsen and common interest team regarding litigation strategy (0.80); E-mails with M. Dale regarding same (0.60); E-mails with M. Dale and W. Dalsen regarding same (0.40); E-mails with M. Dale, W. Dalsen and S. Schaefer regarding same (0.40); E-mails with M. Dale and Proskauer team regarding same (0.40); E-mails with litigation parties regarding depositions (0.30); E-mails with Brattle team regarding same (0.80); E-mails with M. Dale and Brattle team regarding same (0.50); Teleconference with M. Dale regarding same (0.30); Videoconferences with Proskauer team, Brattle team, and common interest team regarding same (7.80); E-mails with M. Dale, M. Pocha, and A. Mohan regarding same (0.20); E-mails with litigation parties regarding deposition documents (0.20); Revise memoranda regarding same (2.70).	15.40	\$12,150.60

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Date	Timekeeper	Task	Description	Hours	Amount
08/11/20	Mee R. Kim	210	E-mails with M. Dale and common interest team regarding litigation strategy (0.20); E-mails with Brattle team regarding same (1.70); E-mails with M. Dale and Proskauer team regarding same (1.30); E-mails with M. Dale regarding same (1.20); E-mails with M. Dale, Proskauer team, Brattle team and Gregory Edwards team regarding same (0.60); E-mails with litigation parties regarding deposition documents (0.60); Revise memoranda regarding same (3.90); E-mails with M. Dale and Brattle team regarding same (0.30); Teleconference with M. Dale regarding same (0.20); Videoconference with Proskauer team, Brattle team and Gregory Edwards regarding virtual deposition (0.60); Videoconference with Proskauer team and Brattle team regarding same (1.20).	11.80	\$9,310.20
08/11/20	Margaret A. Dale	210	Review final draft of Hinton analysis of Table 1 and Table 5 of Argiz reports (0.50); Teleconference with J. Levitan regarding work in progress (0.20); Conference call with expert regarding deposition demonstration (0.50); Conference call with P. Hinton, Brattle team, J. Levitan, S. Weise and R. Kim to prepare for Hinton deposition (1.80); Teleconference with R. Kim regarding preparation for Argiz deposition (0.20); Review Hinton reports to prepare for deposition (1.10); Review documents for use at Hinton deposition (1.50); E-mails with W. Dalsen regarding Hildreth deposition (0.20).	6.00	\$4,734.00
08/11/20	Steven O. Weise	210	Review rebuttal reports and prepare for depositions on tracing of collateral (2.00); Confer with M. Dale and team regarding Hinton deposition preparation (1.80).	3.80	\$2,998.20

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Date	Timekeeper	Task	Description	Hours	Amount
08/11/20	Jeffrey W. Levitan	210	E-mails and teleconferences C. Carney, W. Dalsen regarding Court of Claims case (0.40); Review Court of Claims docket (0.20); Teleconferences with M. Dale, J. Roche regarding expert reports, summary judgment brief (0.40); E-mail W. Dalsen and review responsive correspondence regarding discovery (0.20); Participate in call with P. Hinton and team regarding deposition preparation (1.80); Analyze and outline comments to lien scope summary judgment brief (3.90).	6.90	\$5,444.10
08/11/20	William D. Dalsen	210	Call with counsel to UCC and SCC regarding R. Doty expert deposition today (0.50); Attend expert deposition of R. Doty (5.00); Correspondence with counsel to UCC regarding R. Doty deposition (0.20); Call with counsel to United States regarding status of Court of Federal Claims case (0.50); Correspondence regarding Court of Federal Claims case (0.50); Review final deposition transcript of W. Bartley Hildreth (0.60).	7.30	\$5,759.70
08/11/20	Kevin J. Perra	210	E-mails with W. Dalsen and others regarding Court of Claims case and call with AUSA regarding strategy (0.10); Review and analyze motion by ERS bondholders and related papers for strategy for same (0.50).	0.60	\$473.40
08/12/20	Joshua A. Esses	210	Review status of lien scope adversary proceeding.	0.10	\$78.90
08/12/20	Steven O. Weise	210	Attend Hinton deposition on tracing of collateral.	9.60	\$7,574.40
08/12/20	Margaret A. Dale	210	Teleconference with R. Kim regarding documents for use at P. Hinton deposition (0.30); Conference call with Brattle and R. Kim to discuss documents for use at deposition (0.30); Defend P. Hinton at deposition (8.50); Conference call with Brattle and Proskauer to discuss Argiz deposition prep (0.30).	9.40	\$7,416.60
08/12/20	William D. Dalsen	210	Attend portion of expert deposition of P. Hinton (6.20).	6.20	\$4,891.80

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Date	Timekeeper	Task	Description	Hours	Amount
08/12/20	Jeffrey W. Levitan	210	E-mail with W. Dalsen regarding Court of Claims, review R. Kim analysis and e-mails regarding Hinton deposition (0.50); Teleconferences with J. Esses, E. Barak, and e-mails with J. Roche regarding lien scope summary judgment brief (0.40); Revise summary judgment brief (3.90); Participate in portion of defending Hinton deposition (5.40).	10.20	\$8,047.80
08/12/20	Mee R. Kim	210	Attend P. Hinton deposition (8.50); Attend part of ongoing teleconference with Proskauer team and Brattle team regarding same (1.10); Teleconferences with M. Dale regarding same (0.30); E-mails with Brattle team regarding deposition preparation (0.20); E-mails with M. Dale and Proskauer team regarding same (0.90); E-mails with M. Dale and Brattle team regarding same (0.20); E-mails with M. Dale and W. Dalsen regarding same (0.30); E-mails with M. Dale regarding same (0.20); E-mails with Proskauer team and Gregory Edwards team regarding same (0.30); E-mails with M. Dale, W. Dalsen and M. Pocha regarding same (0.10); E-mails with J. Levitan and Proskauer team regarding litigation strategy (0.40); Review rough P. Hinton deposition transcript (2.20).	14.70	\$11,598.30
08/13/20	Mee R. Kim	210	E-mails with litigation parties regarding A. Argiz deposition (0.20); E-mails with M. Dale and Proskauer team regarding same (1.20); Revise memorandum regarding same (13.70); E-mails with M. Dale regarding same (0.20); E-mails with Brattle team regarding depositions (1.60); E-mails with S. Schaefer regarding same (0.30); E-mails with W. Dalsen regarding same (0.10); Videoconference with M. Dale regarding same (1.20); Teleconference with A. Vargas regarding same (0.10); Videoconference with A. Vargas regarding same (0.90); Teleconference with M. Dale regarding same (0.20); E-mails with J. Levitan and Proskauer team regarding litigation strategy (0.20).	19.90	\$15,701.10

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Date	Timekeeper	Task	Description	Hours	Amount
08/13/20	Margaret A. Dale	210	Review and revise outline for Argiz deposition (2.50); E-mails with R. Kim to prepare for Argiz depo (0.50); Telephone calls with R. Kim to prepare for Argiz deposition (0.50); Conference call with Brattle and R. Kim, S. Weise and J. Levitan to prepare for Argiz deposition (0.70); Review Argiz opening and rebuttal reports to prepare for deposition (3.00).	7.20	\$5,680.80
08/13/20	Steven O. Weise	210	Review rebuttal reports and prepare for depositions on tracing of collateral.	3.80	\$2,998.20
08/13/20	Jeffrey W. Levitan	210	Teleconferences J. Roche, M. Dale regarding depositions, lien scope summary judgment.	0.50	\$394.50
08/14/20	Steven O. Weise	210	Attend Argiz deposition.	8.50	\$6,706.50
08/14/20	Margaret A. Dale	210	Teleconference with R. Kim prior to deposition (0.30); Attend A. Argiz deposition including preparation for continued questioning during breaks (9.30).	9.60	\$7,574.40
08/14/20	Jeffrey W. Levitan	210	Analyze comments to summary judgment motion (0.90); Teleconference J. Roche regarding summary judgment motion, e-mail W. Dalsen regarding Court of claims, and e-mails M. Dale regarding deposition (0.50); Participate in portion of Argiz deposition (1.20).	2.60	\$2,051.40
08/14/20	William D. Dalsen	210	Attend expert deposition of A. Argiz (8.50).	8.50	\$6,706.50
08/14/20	Mee R. Kim	210	E-mails with J. Levitan and Proskauer team regarding litigation strategy (0.50); E-mails with M. Dale regarding A. Argiz deposition (0.30); E-mails with M. Dale and Proskauer team regarding same (0.30); E-mails with Brattle team regarding depositions (0.20); E-mails with Proskauer team and Gregory Edwards team (0.20); Teleconference with M. Dale regarding same (0.30); Depose A. Argiz in virtual deposition (9.30); Discussions with Proskauer team throughout the day regarding same (0.30); E-mails with Proskauer team and Brattle team regarding same (0.30); Prepare for same deposition (5.80).	17.50	\$13,807.50

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Date	Timekeeper	Task	Description	Hours	Amount
08/15/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding expert depositions and motion for summary judgment (0.20); E-mails with R. Kim, W. Dalsen and J. Roche regarding Fiscal Agent accounts and motion for summary judgment (0.50); Review R. Kim e-mail with sample Fiscal Agent account information (0.40).	1.10	\$867.90
08/15/20	Mee R. Kim	210	E-mails with J. Roche and Proskauer team regarding motion for summary judgment strategy (1.70); Review documents regarding same (2.20).	3.90	\$3,077.10
08/15/20	William D. Dalsen	210	Correspondence with J. Roche and team regarding summary judgment briefing (0.20).	0.20	\$157.80
08/16/20	Mee R. Kim	210	E-mails with J. Roche and Proskauer team regarding motion for summary judgment strategy (1.10); Review documents regarding same (2.00).	3.10	\$2,445.90
08/17/20	Mee R. Kim	210	E-mails with J. Roche and Proskauer team regarding motion for summary judgment strategy (1.80); Review documents regarding same (0.80); Teleconference with J. Roche and Proskauer team regarding same (1.50); E-mails with W. Dalsen and Proskauer team regarding litigation strategy (0.30); E-mails with M. Dale, J. Roche, W. Dalsen and Brattle team regarding same (0.50); E-mails with W. Dalsen, Proskauer team and O'Melveny team regarding same (0.20).	5.10	\$4,023.90
08/17/20	Margaret A. Dale	210	Conference call with J. Levitan, S. Weise, J. Roche, W. Dalsen, J. Esses and R. Kim regarding lien scope motion for summary judgment (1.50); E-mails with R. Kim and Brattle group regarding questions regarding fund flow (0.20); E-mails with W. Dalsen and M. Pocha of O'Melveny regarding fund flow issues (0.20).	1.90	\$1,499.10
08/17/20	William D. Dalsen	210	Finalize Hildreth deposition summary (1.20); Call with M. Dale and team regarding summary judgment brief on lien scope issues (1.50).	2.70	\$2,130.30
08/17/20	Ehud Barak	210	Call with M. Dale and ERS team regarding lien scope.	1.50	\$1,183.50

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Date	Timekeeper	Task	Description	Hours	Amount
08/18/20	Margaret A. Dale	210	E-mails with M. Pocha and W. Dalsen regarding Fiscal Agent accounts and form of employee loan (0.20); E-mails with W. Dalsen and R. Kim regarding Fiscal Agent accounts (0.10); Teleconference with W. Dalsen regarding summary judgment motion and timing (0.20).	0.50	\$394.50
08/18/20	William D. Dalsen	210	Correspondence with counsel to AAFAF regarding ERS document productions (0.10); Call with M. Dale regarding summary judgment briefing schedule (0.20); Correspondence with UCC, SCC, and Retirees regarding summary judgment schedule (0.10); Correspondence with counsel to ERS bondholders regarding extension of summary judgment briefing schedule (0.20).	0.60	\$473.40
08/18/20	Mee R. Kim	210	E-mails with J. Roche and Proskauer team regarding motion for summary judgment strategy (2.30); Review documents regarding same (1.60); E-mails with Brattle team regarding same (0.20); E-mails with E. Carino regarding same (0.10).	4.20	\$3,313.80
08/19/20	Mee R. Kim	210	E-mails with J. Roche and Proskauer team regarding motion for summary judgment strategy (0.70); Review documents regarding same (0.40); E-mails with Brattle team regarding same (0.30).	1.40	\$1,104.60
08/19/20	Brian S. Rosen	210	Review revised ERS schedule (0.30); Memorandum to J. Levitan regarding same (0.10); Memorandum to W. Dalsen regarding same (0.10); Review W. Dalsen memorandum regarding same (0.20).	0.70	\$552.30
08/19/20	William D. Dalsen	210	Call with J. Roche and M. Dale regarding summary judgment briefing (0.60); Call with counsel to ERS bondholders regarding summary judgment briefing schedule (0.20); Correspondence with J. Levitan and M. Dale regarding summary judgment briefing schedule (0.20); Correspondence with counsel to Committees and AAFAF regarding summary judgment briefing schedule (0.20); Correspondence with J. Levitan regarding Court of Federal Claims case concerning ERS (0.20).	1.40	\$1,104.60

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Date	Timekeeper	Task	Description	Hours	Amount
08/20/20	William D. Dalsen	210	Call with counsel to United States regarding Court of Federal Claims proceeding relating to ERS (0.80); Correspondence with M. Dale and team regarding summary judgment schedule (0.20); Correspondence with Committees regarding summary judgment schedule (0.30).	1.30	\$1,025.70
08/20/20	Jeffrey W. Levitan	210	E-mails and teleconference J. Roche regarding lien scope summary judgment brief (0.50); Review motion to amend, outline issues to prepare for call on Court of Claims action (0.60); Teleconference W. Dalsen, C. Carney regarding Court of Claims action (0.80); Teleconference W. Dalsen regarding follow-up form call (0.10); Draft outline of points discussed with US Department of Justice (0.40); E-mails W. Dalsen and team regarding briefing schedule (0.50).	2.90	\$2,288.10
08/20/20	Brian S. Rosen	210	Review J. Levitan memorandum regarding ERS scheduling (0.10); Memorandum to J. Levitan regarding same (0.10).	0.20	\$157.80
08/20/20	Mee R. Kim	210	E-mails with J. Roche regarding motion for summary judgment strategy (0.80); Review documents regarding same (0.50); Teleconference with J. Roche regarding same (0.30); E-mails with W. Dalsen and Proskauer team regarding litigation strategy (0.10).	1.70	\$1,341.30
08/20/20	Margaret A. Dale	210	E-mails with W. Dalsen, J. Levitan and B. Rosen regarding summary judgment schedule (0.50).	0.50	\$394.50
08/21/20	Margaret A. Dale	210	Conference call with P. Friedman, M. Pocha, J. Levitan, and W. Dalsen regarding call with Government concerning ERS Bondholders' lawsuit in the Court of Federal Claims (0.50); E-mails with J. Levitan and J. Roche regarding revised draft of the summary judgment motion on lien scope (0.40); Communications with W. Dalsen regarding revised schedule for summary judgment briefing (0.30); Review potential confidentiality designations for Hinton deposition transcript (0.30).	1.50	\$1,183.50

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Date	Timekeeper	Task	Description	Hours	Amount
08/21/20	Mee R. Kim	210	E-mails with J. Roche and Proskauer team regarding motion for summary judgment strategy (0.30); Review documents regarding same (0.70); E-mails with W. Dalsen and Proskauer team regarding litigation strategy (0.20); E-mails with M. Dale and W. Dalsen regarding same (0.30); E-mail with Proskauer team and Jones Day team regarding same (0.10); Discussion with Brattle team regarding same (0.10).	1.70	\$1,341.30
08/21/20	William D. Dalsen	210	Correspondence with M. Dale and team regarding confidentiality designations for expert depositions (0.50); Review Hinton deposition transcript to designate confidential material (0.60); Call with counsel to AAFAF regarding ERS bondholders' Court of Federal Claims proceeding (0.50); Call with Retiree Committee regarding ultra vires and lien scope briefing (0.50); Correspondence with M. Dale and team regarding ultra vires and lien scope briefing (0.50).	2.60	\$2,051.40
08/23/20	Elisa Carino	210	Analyze document productions and deposition transcripts to incorporate in statement of material facts.	2.20	\$1,735.80
08/24/20	Elisa Carino	210	Phone call regarding status of litigation with M. Dale, J. Roche, W. Dalsen, R. Kim and A. Muller.	0.40	\$315.60
08/24/20	Jeffrey W. Levitan	210	E-mails with S. Weise regarding lien scope, review draft fact stipulation, review W. Dalsen e-mail regarding research assignment (0.50); Participate in call with M. Dale and committee representatives regarding lien scope and ultra vires status and strategy (0.40).	0.90	\$710.10
08/24/20	Jennifer L. Roche	210	Conference and e-mails with Committee counsel regarding summary judgment briefing (0.50); Conference with ERS litigation team regarding status and strategy (0.50); Revise draft stipulation of facts for lien scope summary judgment (1.00); E-mails with S. Schaefer regarding argument transcripts (0.10); E-mails with team regarding ERS bank accounts issue (0.10).	2.20	\$1,735.80

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Date	Timekeeper	Task	Description	Hours	Amount
08/24/20	William D. Dalsen	210	Correspondence with counsel to ERS bondholders regarding joint motion to modify briefing schedule (0.10); Call with M. Dale and team regarding case status in ERS lien scope and ultra vires proceedings (0.50); Correspondence with A. Muller regarding research pertaining to Court of Federal Claims case (0.60); Call with counsel to Committees and AAFAF regarding summary judgment briefing (0.50); Call with counsel to SCC regarding summary judgment briefing (0.40).	2.10	\$1,656.90
08/24/20	Margaret A. Dale	210	Conference call with ERS litigation team regarding deadlines and status of work (0.50); Conference call with common interest parties regarding summary judgment motions (0.40); Teleconference with W. Dalsen regarding schedule for summary judgment and other issues (0.10).	1.00	\$789.00
08/24/20	Mee R. Kim	210	E-mails with J. Roche and Proskauer team regarding motion for summary judgment strategy (0.30); Review documents regarding same (0.70); Videoconference with M. Dale and Proskauer team regarding same (0.50).	1.50	\$1,183.50
08/25/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding motion for summary judgment strategy (1.30); Review documents regarding same (1.40).	2.70	\$2,130.30
08/25/20	Margaret A. Dale	210	Review flow of funds charts regarding Fiscal Agent accounts and accounts at ERS/CW (0.30); E-mails with S. Weise and R. Kim regarding same (0.20); Review and revise draft of lien scope summary judgment motion (3.40); E-mails with J. Roche regarding Released Funds issue (0.20).	4.10	\$3,234.90
08/25/20	William D. Dalsen	210	Review correspondence and documents from E. Carino regarding summary judgment arguments (0.30); Correspondence with J. Roche regarding summary judgment argument (0.30).	0.60	\$473.40
08/26/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding summary judgment issues (0.30); Review and revise statement of undisputed facts in support of summary judgment motion (0.50); E-mails with J. Levitan, J. Roche and R. Kim regarding facts in support of summary judgment (0.20).	1.00	\$789.00

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Date	Timekeeper	Task	Description	Hours	Amount
08/26/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding motion for summary judgment strategy (0.40);	1.10	\$867.90
08/27/20	Mee R. Kim	210	Teleconference with J. Levitan regarding same (0.30); Review documents regarding same (0.40). E-mails with M. Dale and Proskauer team regarding motion for summary judgment strategy (1.00); Review documents regarding same (0.30).	1.30	\$1,025.70
08/27/20	Margaret A. Dale	210	E-mails with J. Levitan, S. Weise, R. Kim and J. Esses regarding trustee motion and waiver arguments (0.50); Review letter from bondholders regarding open discovery issues related to administrative expense claims (0.20); E-mails with W. Dalsen and M. Pocha regarding same (0.20).	0.90	\$710.10
08/27/20	William D. Dalsen	210	Correspondence with M. Dale regarding ERS bondholder request for conference regarding claims/administrative expense discovery requests (0.40); Review legal research from A. Muller regarding Court of Federal Claims case (1.00).	1.40	\$1,104.60
08/28/20	William D. Dalsen	210	Correspondence with E. Chernus regarding ERS produced documents in Rule 2004 matter (0.20).	0.20	\$157.80
08/28/20	Jennifer L. Roche	210	Conference with S. Weise, J. Esses, R. Kim and M. Dale regarding lien scope summary judgment brief (1.00); E-mails with L. Silvestro regarding argument transcripts (0.10); Revise lien scope summary judgment brief and statement of facts (3.00).	4.10	\$3,234.90
08/28/20	Joshua A. Esses	210	Call with M. Dale and team on lien scope summary judgment motion.	1.20	\$946.80
08/28/20	Margaret A. Dale	210	Conference call with J. Levitan, S. Weise, J. Roche, R. Kim and J. Esses regarding summary judgment motion on lien scope and statement of undisputed facts (1.20).	1.20	\$946.80
08/28/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding motion for summary judgment strategy (0.30); Videoconference with M. Dale and Proskauer team regarding same (0.50); Review documents regarding same (3.20).	4.00	\$3,156.00
08/29/20	Jennifer L. Roche	210	Review proposed revisions to summary judgment brief (0.20); E-mail R. Kim regarding ERS declaration (0.10); Revise summary judgment brief (1.00).	1.30	\$1,025.70

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Date	Timekeeper	Task	Description	Hours	Amount
08/29/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding motion for summary judgment strategy (0.30); E-mails with J. Roche regarding same (0.10).	0.40	\$315.60
08/30/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding motion for summary judgment strategy (0.40); Review documents regarding same (0.40).	0.80	\$631.20
08/30/20	Margaret A. Dale	210	Review and revise draft of motion for summary judgment on lien scope issues (0.80); E-mail team regarding additional edits/questions on summary judgment motion (0.20).	1.00	\$789.00
08/30/20	Jennifer L. Roche	210	E-mails with M. Dale regarding lien scope summary judgment brief (0.10); Revise draft brief (1.10).	1.20	\$946.80
08/31/20	Jennifer L. Roche	210	Conference with J. Levitan, M. Dale, S. Weise, J. Esses and R. Kim regarding lien scope motion and supporting documents (1.00); Revise summary judgment motion (1.50); E-mails with A. Muller regarding research for summary judgment motion (0.10); Revise separate statement and proposed stipulation of facts (0.80).	3.40	\$2,682.60
08/31/20	Margaret A. Dale	210	Review S. Weise edits to lien scope summary judgment motion (0.30); Conference call with J. Levitan, S. Weise, J. Roche, J. Esses and R. Kim regarding edits/next steps on lien scope summary judgment motion (0.60); Review letter from C. DiPompeo regarding discovery responses/objections related to administrative expense claims (0.20); Conference call with M. Pocha, W. Sushon and W. Dalsen regarding response to C. DiPompeo letter and next steps (0.50).	1.60	\$1,262.40
08/31/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding motion for summary judgment strategy (0.90); Review documents regarding same (0.80); E-mails with J. Roche regarding same (0.20); Videoconference with M. Dale and Proskauer team regarding same (0.60); Draft brief regarding same (2.00); E-mails with M. Dale and Board advisors regarding same (0.20); E-mails with M. Dale regarding same (0.20).	4.90	\$3,866.10

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Date	Timekeeper	Task	Description	Hours	Amount
08/31/20	Jeffrey W. Levitan	210	Review analysis of Court of Claims intervention, and e-mails with E. Barak regarding same (0.50); Review revised lien scope brief (0.90); Review revised statement of undisputed facts (0.40); E-mails J. Roche and team regarding open issues on brief (0.50); Draft list of discussion points for team call (0.30); Participate in call with J. Roche and team regarding summary judgment (0.70); Teleconferences E. Barak regarding lien scope summary judgment (0.30).	3.60	\$2,840.40
08/31/20	William D. Dalsen	210	Correspondence with J. Levitan regarding analysis of intervention arguments in Court of Federal Claims proceeding (0.90); Call with M. Dale regarding Bondholder discovery requests in claims/administrative expense proceedings (0.20); Call with counsel to AAFAF regarding Bondholder discovery requests in claims/administrative expense proceedings (0.50).	1.60	\$1,262.40
Analysis and Strategy				472.70	\$372,960.30

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Date	Timekeeper	Task	Description	Hours	Amount
08/01/20	Shealeen E. Schaefer	212	Confer with L. Silvestro regarding schedule and logistics associated with expert depositions.	0.30	\$81.00
08/01/20	Shealeen E. Schaefer	212	Confer with L. Silvestro regarding paralegal assignments in connection with motion for summary judgment.	0.20	\$54.00
08/01/20	Shealeen E. Schaefer	212	E-mails with W. Dalsen regarding materials cited in expert reports.	0.20	\$54.00
08/01/20	Shealeen E. Schaefer	212	Review production documents to prepare overlay detailing Bates ranges for unitized document project.	1.30	\$351.00
08/01/20	Lawrence T. Silvestro	212	Confer with S. Schaefer regarding schedule and logistics associated with expert depositions (0.30); Confer with S. Schaefer regarding paralegal assignments in connection with motion for summary judgment (0.20).	0.50	\$135.00
08/02/20	Lawrence T. Silvestro	212	Review corrected depositions and exhibits against transcripts (1.60); Synchronize and store electronic deposition files (0.90).	2.50	\$675.00

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Date	Timekeeper	Task	Description	Hours	Amount
08/02/20	Shealeen E. Schaefer	212	Review production documents to create overlay detailing Bates ranges for unitized document project.	3.30	\$891.00
08/03/20	Shealeen E. Schaefer	212	Review production documents to create overlay detailing metadata for document productions.	3.40	\$918.00
08/03/20	Shealeen E. Schaefer	212	E-mails with A. Muller regarding expert deposition notices.	0.20	\$54.00
08/03/20	Shealeen E. Schaefer	212	Review expert deposition notices received from Jones Day.	0.10	\$27.00
08/03/20	Shealeen E. Schaefer	212	Telephone calls with L. Silvestro regarding preparations and logistics for expert depositions.	0.40	\$108.00
08/03/20	Lawrence T. Silvestro	212	Telephone call with S. Schaefer regarding preparation for expert depositions (0.40); Arrange logistics for said depositions with Court reporting service (0.60); Review and organize documents cited in previous deposition exhibits expert deposition preparation (3.10).	4.10	\$1,107.00
08/03/20	Olaide M. Adejobi	212	Draft final updates to deposition exhibit index (0.10); Circulate deposition calendar invitations per W. Dalsen (0.20); Update deposition calendar per L. Silvestro (0.10).	0.40	\$108.00
08/04/20	Lawrence T. Silvestro	212	Telephone call with S. Schaefer regarding technology and exhibits for upcoming depositions (0.70); Telephone call with S. Schaefer regarding potential documents and exhibits in support of motion for summary judgment (1.10); Review bond and offering statements and other financial statements to identify potential exhibits (3.60).	5.40	\$1,458.00
08/04/20	Shealeen E. Schaefer	212	Review materials cited in bondholder's expert reports in preparation for depositions.	2.30	\$621.00
08/04/20	Shealeen E. Schaefer	212	Review production materials and case records to identify materials and potential exhibits in support of motion for summary judgment.	4.90	\$1,323.00
08/04/20	Shealeen E. Schaefer	212	Telephone calls with L. Silvestro regarding technology and exhibits for expert depositions.	0.70	\$189.00
08/04/20	Shealeen E. Schaefer	212	Telephone calls with L. Silvestro regarding identification of documents and materials in support of summary judgment.	1.10	\$297.00
08/05/20	Shealeen E. Schaefer	212	Identify and gather information related to experts in connection with upcoming depositions.	2.80	\$756.00

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Date	Timekeeper	Task	Description	Hours	Amount
08/05/20	Shealeen E. Schaefer	212	Update chart detailing information related to experts in preparation for upcoming depositions.	1.90	\$513.00
08/05/20	Shealeen E. Schaefer	212	Identification and organization of production materials in support of summary judgment.	2.30	\$621.00
08/05/20	Lawrence T. Silvestro	212	Review Court filings to locate financial statements to identify as potential exhibits related to summary judgment (4.30).	4.30	\$1,161.00
08/06/20	Lawrence T. Silvestro	212	Review all deposition exhibits to locate produced versions of financing statements, bond offerings and other documents to identify as potential exhibits for expert depositions related to summary judgment (3.60); Review and research all ERS title III adversary cases to identify documents as potential declaration exhibits (1.90); Telephone call with S. Schaefer regarding documents and logistics in preparation for expert depositions (0.60).	6.10	\$1,647.00
08/06/20	Shealeen E. Schaefer	212	Telephone call with L. Silvestro regarding preparations and logistics for expert depositions.	0.60	\$162.00
08/06/20	Shealeen E. Schaefer	212	Identify and organize attorney review materials in advance of bondholders' expert depositions.	4.20	\$1,134.00
08/06/20	Shealeen E. Schaefer	212	E-mails with attorney R. Kim regarding materials for bondholders' expert depositions.	0.20	\$54.00
08/06/20	Shealeen E. Schaefer	212	E-mails with attorney W. Dalsen regarding research in preparation for expert depositions.	0.20	\$54.00
08/06/20	Shealeen E. Schaefer	212	Review and organization of deposition materials in preparation for motion for summary judgment.	2.80	\$756.00
08/06/20	Shealeen E. Schaefer	212	E-mails with Proskauer Library regarding research in connection with upcoming expert depositions.	0.20	\$54.00
08/07/20	Shealeen E. Schaefer	212	Draft document detailing key testimony and exhibits in action including incorporation of overlay of hyperlinks to materials.	2.90	\$783.00
08/07/20	Shealeen E. Schaefer	212	Review documents cited and research regarding bondholders' experts in preparation for depositions.	2.60	\$702.00
08/07/20	Shealeen E. Schaefer	212	Telephone calls with L. Silvestro regarding task list and organization of materials in support of summary judgment.	1.10	\$297.00

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Date	Timekeeper	Task	Description	Hours	Amount
08/07/20	Lawrence T. Silvestro	212	Review all deposition exhibits to locate produced versions of financing statements, bond offerings and other documents to identify as potential exhibits for expert depositions related to summary judgment (3.80); E-mail and telephone calls with Court reporters regarding the need for interpreters to be present at certain depositions (0.20); Telephone calls with S. Schaefer regarding task list and organization of materials in support of summary judgment (1.10); Review received witness deposition errata to determine which have not been received/signed (0.30).	5.40	\$1,458.00
08/07/20	Shealeen E. Schaefer	212	Review e-mails with Court reporter regarding expert depositions.	0.20	\$54.00
08/07/20	Shealeen E. Schaefer	212	Review e-mails with Court reporter regarding errata sheets.	0.30	\$81.00
08/07/20	Shealeen E. Schaefer	212	Coordinate conference call with E. Carino and L. Silvestro to discuss task list in connection with summary judgment.	0.20	\$54.00
08/07/20	Shealeen E. Schaefer	212	E-mails with Proskauer Library regarding research for upcoming expert depositions.	0.20	\$54.00
08/07/20	Shealeen E. Schaefer	212	Update case records to incorporate discovery related correspondence and documents.	0.30	\$81.00
08/08/20	Shealeen E. Schaefer	212	E-mail to W. Dalsen forwarding documents and information for Hildreth deposition.	0.30	\$81.00
08/09/20	Shealeen E. Schaefer	212	Draft document detailing testimony and exhibits including overlay of hyperlinks to materials.	2.90	\$783.00
08/09/20	Shealeen E. Schaefer	212	Review production documents to identify exhibits for Hildreth deposition.	0.60	\$162.00
08/09/20	Shealeen E. Schaefer	212	E-mails to attorney W. Dalsen regarding exhibits in preparation for expert depositions.	0.30	\$81.00
08/10/20	Shealeen E. Schaefer	212	Review and capture production documents for attorney review in preparation for expert depositions.	0.70	\$189.00
08/10/20	Shealeen E. Schaefer	212	E-mail to R. Kim forwarding production documents for review in preparation for expert depositions.	0.20	\$54.00
08/10/20	Shealeen E. Schaefer	212	Review production materials and case records and identify materials and potential exhibits in support of motion for summary judgment.	4.10	\$1,107.00

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Date	Timekeeper	Task	Description	Hours	Amount
08/10/20	Shealeen E. Schaefer	212	Draft document detailing summaries of key deposition testimony and exhibits including overlay of hyperlinks to materials and errata details.	3.70	\$999.00
08/10/20	Lawrence T. Silvestro	212	Review statement of fact and summary judgment draft to identify additional sources as potential exhibits for expert depositions related to summary judgment (3.40); Conference call with E. Carino and S. Schaefer regarding summary judgment (0.30); Review deposition transcripts to identify testimony and exhibits related to the bond offerings (1.70).	5.40	\$1,458.00
08/11/20	Lawrence T. Silvestro	212	Review case records and Court filings to identify materials in support of summary judgment and statement of facts (4.40); Update expert witness depositions and documents to be relied on (0.40).	4.80	\$1,296.00
08/11/20	Shealeen E. Schaefer	212	Review depositions transcripts and prepare summary information of key testimony.	3.80	\$1,026.00
08/11/20	Shealeen E. Schaefer	212	Update document detailing summaries of key deposition testimony and exhibits to include additional overlays of hyperlinks to materials and errata details.	2.90	\$783.00
08/11/20	Shealeen E. Schaefer	212	Prepare potential exhibits in support of summary judgment.	1.70	\$459.00
08/11/20	Shealeen E. Schaefer	212	E-mail to E. Carino regarding confidentiality designations.	0.20	\$54.00
08/11/20	Shealeen E. Schaefer	212	Review rough draft of W. Hildreth deposition transcript.	0.70	\$189.00
08/11/20	Lela Lerner	212	Compile docket entries from motion for summary judgment (lien scope) and organize same.	0.70	\$189.00
08/11/20	Olaide M. Adejobi	212	Index exhibits from Hildreth and Gonzalez expert depositions.	0.40	\$108.00
08/12/20	Shealeen E. Schaefer	212	Telephone call with L. Silvestro regarding identification of materials in support of summary judgment.	0.50	\$135.00
08/12/20	Shealeen E. Schaefer	212	Review W. Hildreth deposition transcript.	1.40	\$378.00
08/12/20	Shealeen E. Schaefer	212	Review L. Gonzalez deposition transcript.	0.90	\$243.00
08/12/20	Shealeen E. Schaefer	212	Update master workbook outlining deposition testimony and associated exhibits.	1.10	\$297.00
08/12/20	Shealeen E. Schaefer	212	Review R. Doty deposition transcript.	1.10	\$297.00

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Date	Timekeeper	Task	Description	Hours	Amount
08/12/20	Lawrence T. Silvestro	212	Telephone call with S. Schaefer regarding identification of materials in support of summary judgment (0.50); Update electronic files for expert deposition transcripts and exhibits (0.90); Index and identify exhibits cited in expert depositions (1.90).	3.30	\$891.00
08/13/20	Angelo Monforte	212	Compile underlying briefing and appellate briefing regarding ERS motion for summary judgment per D. Munkittrick.	0.30	\$81.00
08/13/20	Lawrence T. Silvestro	212	Review revise summary judgment motion to identify additional sources (1.30).	1.30	\$351.00
08/13/20	Shealeen E. Schaefer	212	Review case records to identify materials and potential exhibits for Argiz deposition.	1.30	\$351.00
08/13/20	Shealeen E. Schaefer	212	Review P. Hinton's deposition transcript.	1.30	\$351.00
08/13/20	Shealeen E. Schaefer	212	Review workbook detailing information regarding bondholders' expert T. Argiz.	1.30	\$351.00
08/14/20	Shealeen E. Schaefer	212	Update case databases to incorporate discovery correspondence, deposition transcripts and exhibits.	0.70	\$189.00
08/14/20	Shealeen E. Schaefer	212	Review expert deposition transcripts to verify exhibits.	1.70	\$459.00
08/14/20	Shealeen E. Schaefer	212	Review production database to identify and download documents requested by attorney W. Dalsen.	0.30	\$81.00
08/14/20	Shealeen E. Schaefer	212	E-mails with case team regarding current draft of testimony summary workbook.	0.10	\$27.00
08/14/20	Lawrence T. Silvestro	212	Index and identify exhibits cited in expert depositions (1.30).	1.30	\$351.00
08/17/20	Shealeen E. Schaefer	212	Identify exhibits in support of statement of facts.	4.10	\$1,107.00
08/17/20	Shealeen E. Schaefer	212	E-mail to E. Carino regarding tasks associated with summary judgment.	0.20	\$54.00
08/17/20	Shealeen E. Schaefer	212	Review revised draft motion for summary judgment to identify additional materials in support.	0.40	\$108.00
08/17/20	Shealeen E. Schaefer	212	Update and organize case databases to incorporate discovery materials.	1.20	\$324.00
08/17/20	Shealeen E. Schaefer	212	Update compilation of materials in support of summary judgment for attorney review.	1.30	\$351.00
08/18/20	Shealeen E. Schaefer	212	Telephone call with E. Carino regarding tasks associated with summary judgment.	0.40	\$108.00
08/18/20	Shealeen E. Schaefer	212	Analysis of case records and discovery materials to identify testimony and potential exhibits in support of summary judgment and ancillary documents.	5.80	\$1,566.00

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Date	Timekeeper	Task	Description	Hours	Amount
08/18/20	Lawrence T. Silvestro	212	Review proposed stipulation of fact and summary judgment draft to identify additional sources as potential exhibits related to summary judgment (2.60); Review and index exhibits to expert deposition transcripts (1.90); Review laws of Puerto Rico annotated in summary judgment draft and locate corresponding UCC citations (0.90).	5.40	\$1,458.00
08/19/20	Lawrence T. Silvestro	212	Draft summary judgment notice of motion and proposed order (2.90); Index expert deposition exhibits and import electronic video synced files to Case Notebook (1.80).	4.70	\$1,269.00
08/19/20	Shealeen E. Schaefer	212	Review and analyze document productions in regard to account information.	4.90	\$1,323.00
08/19/20	Shealeen E. Schaefer	212	Call and e-mails with attorney E. Carino regarding historical account information.	0.20	\$54.00
08/19/20	Shealeen E. Schaefer	212	Update and organize case database to incorporate additional discovery materials.	2.40	\$648.00
08/20/20	Shealeen E. Schaefer	212	Continue review and analysis of case records and document productions regarding accounts in connection with summary judgment and ancillary documents.	5.60	\$1,512.00
08/20/20	Shealeen E. Schaefer	212	Review Argiz deposition transcript.	0.90	\$243.00
08/20/20	Lawrence T. Silvestro	212	Draft summary judgment notice of motion and proposed order (2.90); Index expert deposition exhibits and import electronic video synced files to Case Notebook (1.80); Review and file proposed summary judgment sources (0.80); Research deposition transcripts to identify testimony related to Bank of New York Mellon (1.10).	6.60	\$1,782.00
08/21/20	Shealeen E. Schaefer	212	E-mails with W. Dalsen regarding confidentiality designations.	0.20	\$54.00
08/21/20	Shealeen E. Schaefer	212	Review January 2020 protective order regarding confidentiality.	0.20	\$54.00
08/21/20	Shealeen E. Schaefer	212	Review case records to identify certain account documents in connection with summary judgment.	1.10	\$297.00
08/21/20	Shealeen E. Schaefer	212	Review correspondence with Jones Day regarding deposition confidentiality designations.	0.40	\$108.00
08/24/20	Shealeen E. Schaefer	212	Review transcripts to identify information in support of summary judgment.	3.20	\$864.00

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Date	Timekeeper	Task	Description	Hours	Amount
08/24/20	Lawrence T. Silvestro	212	Index expert deposition exhibits and import electronic video synced files to Case Notebook (1.90); Review revised summary judgment draft and statement of facts to identify additional sources (1.20); Review procedures for requesting oral argument transcript from First Circuit in preparation for summary judgment (0.80).	3.90	\$1,053.00
08/25/20	Lawrence T. Silvestro	212	Conform and index deposition exhibits to identify exhibits that were used in multiple depositions and import electronic video synced files to internal repository (2.80); Review and redline further revised summary judgment draft to identify additional caselaw and other authorities (1.80).	4.60	\$1,242.00
08/25/20	Shealeen E. Schaefer	212	Review draft summary judgment to identify additional materials in support.	1.00	\$270.00
08/26/20	Lawrence T. Silvestro	212	Revise deposition exhibits to identify exhibits that were used in multiple depositions and import electronic video synced files to internal repository (2.90).	2.90	\$783.00
08/26/20	Olaide M. Adejobi	212	Update index with exhibits from expert depositions.	1.00	\$270.00
08/27/20	Lawrence T. Silvestro	212	Further review of deposition exhibits to identify exhibits that were used in multiple depositions and import electronic video synced files to internal repository (2.10).	2.10	\$567.00
08/27/20	Shealeen E. Schaefer	212	Analyze case record to identify documents in support of undisputed facts.	3.20	\$864.00
08/28/20	Eric R. Chernus	212	Send new received production to vendor with foldering and loading instructions (0.30).	0.30	\$81.00
08/28/20	Shealeen E. Schaefer	212	Review expert deposition transcripts to verify record capture and exhibits.	1.60	\$432.00
General Administration				191.20	\$51,624.00

Employment and Fee Applications -- 218

Date	Timekeeper	Task	Description	Hours	Amount
08/04/20	Natasha Petrov	218	Revise 9th interim fee application per P. Possinger and M. Volin's comments.	0.90	\$243.00
08/05/20	Natasha Petrov	218	Revise 9th interim fee application per M. Volin's comments (0.40); Draft notice of filing for same (0.40).	0.80	\$216.00
08/07/20	Megan R. Volin	218	Review and revise draft fee application (2.60); E-mails with E. Stevens regarding fee application (0.10).	2.70	\$2,130.30

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Date	Timekeeper	Task	Description	Hours	Amount
08/13/20	Natasha Petrov	218	Revise 9th interim fee application per M. Bienenstock's comments.	0.90	\$243.00
08/18/20	Natasha Petrov	218	Revise redactions of certain entries for ninth interim fee application per S. Victor (0.60); Prepare exhibits to same (0.80).	1.40	\$378.00
08/25/20	Natasha Petrov	218	Revise exhibits to ninth interim fee application.	1.70	\$459.00
08/27/20	Natasha Petrov	218	Revise Proskauer ninth fee application per M. Volin (0.90); Revise notice of filing of same (0.20).	1.10	\$297.00
Employment and Fee Applications				9.50	\$3,966.30

Appeal -- 219

Date	Timekeeper	Task	Description	Hours	Amount
08/07/20	Timothy W. Mungovan	219	E-mails with M. Harris and M. Bienenstock regarding bondholders' certiorari petition (0.30).	0.30	\$236.70
08/29/20	Steven O. Weise	219	Review outline for opposition to bondholder petition for certiorari.	1.30	\$1,025.70
08/29/20	Steven O. Weise	219	Review bondholder petition for certiorari.	3.20	\$2,524.80
08/30/20	Jeffrey W. Levitan	219	Review revised certiorari opposition outline and e-mail M. Harris regarding same.	0.20	\$157.80
Appeal				5.00	\$3,945.00

Total for Professional Services

\$631,008.00

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Timekeeper Summary

Timekeeper	Status	Hours	Rate	Value
BRIAN S. ROSEN	PARTNER	2.90	789.00	\$2,288.10
EHUD BARAK	PARTNER	5.00	789.00	\$3,945.00
JEFFREY W. LEVITAN	PARTNER	86.10	789.00	\$67,932.90
KEVIN J. PERRA	PARTNER	0.60	789.00	\$473.40
MARGARET A. DALE	PARTNER	77.40	789.00	\$61,068.60
RON D. FRANKLIN	PARTNER	0.50	789.00	\$394.50
STEVEN O. WEISE	PARTNER	111.10	789.00	\$87,657.90
TIMOTHY W. MUNGOVAN	PARTNER	0.30	789.00	\$236.70
Total for PARTNER		283.90		\$223,997.10
JENNIFER L. ROCHE	SENIOR COUNSEL	86.50	789.00	\$68,248.50
Total for SENIOR COUNSEL		86.50		\$68,248.50
ARIELLA MULLER	ASSOCIATE	35.70	789.00	\$28,167.30
ELISA CARINO	ASSOCIATE	19.00	789.00	\$14,991.00
JOSHUA A. ESSES	ASSOCIATE	11.00	789.00	\$8,679.00
MEE R. KIM	ASSOCIATE	213.40	789.00	\$168,372.60
MEGAN R. VOLIN	ASSOCIATE	2.70	789.00	\$2,130.30
WILLIAM D. DALSEN	ASSOCIATE	79.80	789.00	\$62,962.20
Total for ASSOCIATE		361.60		\$285,302.40
ANGELO MONFORTE	LEGAL ASSISTANT	0.30	270.00	\$81.00
LAWRENCE T. SILVESTRO	LEGAL ASSISTANT	74.60	270.00	\$20,142.00
LELA LERNER	LEGAL ASSISTANT	0.70	270.00	\$189.00
NATASHA PETROV	LEGAL ASSISTANT	6.80	270.00	\$1,836.00
OLAIDE M. ADEJOBI	LEGAL ASSISTANT	1.80	270.00	\$486.00
SHEALEEN E. SCHAEFER	LEGAL ASSISTANT	113.50	270.00	\$30,645.00
Total for LEGAL ASSISTANT		197.70		\$53,379.00
ERIC R. CHERNUS	PRAC. SUPPORT	0.30	270.00	\$81.00
Total for PRAC. SUPPORT		0.30		\$81.00
Total		930.00		\$631,008.00

For Charges and Disbursements

Date	Timekeeper	Type	Description	Amount
08/07/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$0.20
08/07/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$4.00
08/07/2020	Olaide M. Adejobi	REPRODUCTION	REPRODUCTION	\$0.70
			Total for REPRODUCTION	\$4.90

Date	Timekeeper	Type	Description	Amount
07/31/2020	Jennifer L. Roche	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$198.00
08/07/2020	Rachael Hope Moller	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$99.00

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Date	Timekeeper	Type	Description	Amount
08/11/2020	Lawrence T. Silvestro	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$449.00
			Total for LEXIS	\$746.00

Date	Timekeeper	Type	Description	Amount
07/27/2020	Lawrence T. Silvestro	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 9 Lines Printed	\$1,102.00
07/27/2020	Shealeen E. Schaefer	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 7 Lines Printed	\$715.00
07/28/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 9 Lines Printed	\$408.00
07/28/2020	Shealeen E. Schaefer	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 158 Lines Printed	\$858.00
07/29/2020	Shealeen E. Schaefer	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 5 Lines Printed	\$286.00
08/05/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 23 Lines Printed	\$1,716.00
08/06/2020	Ariella Muller	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 6 Lines Printed	\$661.00
08/07/2020	Ariella Muller	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 2 Lines Printed	\$432.00
08/07/2020	Rachael Hope Moller	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 4 Lines Printed	\$1,049.00
08/07/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 11 Lines Printed	\$143.00
08/11/2020	Lawrence T. Silvestro	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 35 Lines Printed	\$143.00
08/13/2020	Ariella Muller	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 3 Lines Printed	\$366.00
08/13/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 8 Lines Printed	\$572.00
08/14/2020	Ariella Muller	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 15 Lines Printed	\$1,851.00
08/14/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 19 Lines Printed	\$715.00
08/15/2020	Elisa Carino	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 17 Lines Printed	\$572.00

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Total for WESTLAW \$11,589.00

Date	Timekeeper	Type	Description	Amount
08/04/2020	Martin J. Bienenstock	HIGHQ LICENSING	HIGHQ LICENSING - ERS Lien Scope - M. Rina Kim - Shealeen Schaefer - 02/04/2020 09:09:38 PM	\$185.00
Total for HIGHQ LICENSING				\$185.00

Date	Timekeeper	Type	Description	Amount
06/11/2020	Martin J. Bienenstock	MESSENGER/DELIV ERY	MESSENGER/DELIVERY Delivery Margaret Dale Proskauer Rose LLP 510 PHILADELPHI A BLVD SEA GIRT NJ, Tracking #: 393752201806, Sh ipped on 061120, Invoice #: 704348841	\$17.68
06/18/2020	Martin J. Bienenstock	MESSENGER/DELIV ERY	MESSENGER/DELIVERY Delivery Margaret Dale 510 PHILADELPHIA BLVD SEA GIRT NJ , Tracking #: 393986857783, Shipped on 061820, I nvoice #: 704969006	\$32.38
06/22/2020	Martin J. Bienenstock	MESSENGER/DELIV ERY	MESSENGER/DELIVERY Delivery Jonathan Richman, Esq 325 W END AVE APT 5B NEW Y ORK NY, Tracking #: 394086542751, Shipped on 062 220, Invoice #: 704969006	\$25.71
07/02/2020	Martin J. Bienenstock	MESSENGER/DELIV ERY	MESSENGER/DELIVERY Delivery Margaret Dale PROSKAUER 510 PHILADELPHIA BLVD SE A GIRT NJ, Tracking #: 394461996278, Shipped on 070220, Invoice #: 706156757	\$20.40
07/22/2020	Martin J. Bienenstock	MESSENGER/DELIV ERY	MESSENGER/DELIVERY Delivery Rina Kim 400 Masssachusetts Ave NW, Uni WASHINGT ON DC, Tracking #: 395058695879, Shipped on 0722 20, Invoice #: 708079282	\$20.45
07/28/2020	Martin J. Bienenstock	MESSENGER/DELIV ERY	MESSENGER/DELIVERY Delivery Rina Kim 400 Massachusetts Ave NW 920 WASHINGTO N DC, Tracking #: 395245730961, Shipped on 07282 0, Invoice #: 708079282	\$19.60
Total for MESSENGER/DELIVERY				\$136.22

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Charges and Disbursements Summary

Type of Disbursements	Amount
REPRODUCTION	4.90
LEXIS	746.00
WESTLAW	11,589.00
HIGHQ LICENSING	185.00
MESSENGER/DELIVERY	136.22
OUTSIDE REPRODUCTION	691.37
Total Expenses	\$13,352.49
Total Amount for this Matter	\$644,360.49

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Summary of Time Billed by Task		Hours	Value
212	General Administration	2.10	\$567.00
219	Appeal	66.20	\$52,231.80
Total		68.30	\$52,798.80

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General Administration -- 212

Date	Timekeeper	Task	Description	Hours	Amount
08/03/20	Angelo Monforte	212	Andalusian: Review ERS bondholders' petition for a writ of certiorari and compile case law cited in same per W. Dalsen (1.10); Coordinate with deadlines time regarding docketing of response deadline regarding same (0.30).	1.40	\$378.00
08/10/20	Angelo Monforte	212	Andalusian: Review Supreme Court case docket and coordinate with deadline team docketing of response deadline to ERS bondholders' petition for a writ of certiorari.	0.30	\$81.00
08/13/20	Laurie A. Henderson	212	Andalusian: Electronic filing with the Supreme Court of the U.S. of notice of appearance of M. Bienenstock and motion for extension of time in Appeal No. 20-0126.	0.40	\$108.00
General Administration				2.10	\$567.00

Appeal -- 219

Date	Timekeeper	Task	Description	Hours	Amount
08/03/20	William D. Dalsen	219	Andalusian: Review certiorari petition and supporting cases (1.30).	1.30	\$1,025.70
08/03/20	Kevin J. Perra	219	Andalusian: Review and analyze certiorari petition.	1.00	\$789.00
08/04/20	John E. Roberts	219	Andalusian: Review and analyze petition for certiorari in Andalusian appeal.	3.10	\$2,445.90
08/04/20	Mark Harris	219	Andalusian: Review certiorari petition.	0.90	\$710.10
08/04/20	Margaret A. Dale	219	Andalusian: E-mails with M. Harris regarding Ambac certiorari petition regarding 552 decision (0.10).	0.10	\$78.90
08/04/20	Joshua A. Esses	219	Andalusian: Draft summary of ERS bondholder certiorari petition for M. Dale.	2.10	\$1,656.90
08/05/20	Margaret A. Dale	219	Andalusian: Review ERS bondholder petition for certiorari regarding section 552 decision (partial) (0.50); Review draft write-up of ERS cert petition for M. Bienenstock (0.20).	0.70	\$552.30
08/05/20	William D. Dalsen	219	Andalusian: Review ERS bondholders' section 552 certiorari petition and cited cases (2.00); Call with J. Roberts regarding ERS bondholders' petition for certiorari (1.30).	3.30	\$2,603.70
08/05/20	John E. Roberts	219	Andalusian: Call with W. Dalsen to discuss strategy for responding to petition for certiorari.	1.30	\$1,025.70
08/06/20	Steven O. Weise	219	Andalusian: Review certiorari petition of bondholders on Bankruptcy Code § 552 issues.	2.20	\$1,735.80
08/06/20	Jeffrey W. Levitan	219	Andalusian: Review outline of certiorari petition (0.40); E-mails with J. Roberts regarding certiorari petition (0.30).	0.70	\$552.30

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Date	Timekeeper	Task	Description	Hours	Amount
08/06/20	Adam L. Deming	219	Andalusian: Review Andalusian certiorari petition in preparation for drafting of opposition to certiorari petition at J. Roberts' direction.	1.20	\$946.80
08/07/20	Adam L. Deming	219	Andalusian: Confer with L. Stafford regarding recent developments and Board-managed proceedings relevant to request for extension (0.20); Draft extension letter for Andalusian certiorari opposition (0.80).	1.00	\$789.00
08/07/20	Adam L. Deming	219	Andalusian: Call with J. Roberts to discuss strategy and timeline for Andalusian certiorari opposition.	0.50	\$394.50
08/07/20	Mark Harris	219	Andalusian: Review issues in connection with extension of time for certiorari opposition.	0.50	\$394.50
08/07/20	Steven O. Weise	219	Andalusian: Review certiorari petition of bondholders on Bankruptcy Code § 552 issues.	1.60	\$1,262.40
08/07/20	John E. Roberts	219	Andalusian: Call with A. Deming to discuss drafting certiorari opposition (0.50); Draft e-mails to team concerning issues in certiorari opposition and request for extension of time (0.30).	0.80	\$631.20
08/07/20	Jeffrey W. Levitan	219	Andalusian: Review M. Harris e-mails regarding certiorari opposition (0.20).	0.20	\$157.80
08/10/20	John E. Roberts	219	Andalusian: Revise motion to extend time to file certiorari opposition.	0.20	\$157.80
08/10/20	Timothy W. Mungovan	219	Andalusian: Review Andalusian's petition for certiorari (0.50).	0.50	\$394.50
08/12/20	John E. Roberts	219	Andalusian: Analyze issues raised in petition for certiorari in preparation for drafting response.	2.50	\$1,972.50
08/12/20	Adam L. Deming	219	Andalusian: Review Andalusian First Circuit decision in preparation for outlining of certiorari petition opposition.	0.20	\$157.80
08/13/20	Adam L. Deming	219	Andalusian: Review and annotate First Circuit decision in Andalusian in preparation for organizing response to petition for certiorari (2.30); Conduct preliminary research regarding operation of Section 552 and statutory definition of "proceeds" and "property" (1.00).	3.30	\$2,603.70
08/13/20	John E. Roberts	219	Andalusian: Revise filing of letter requesting extension of time to file certiorari opposition.	0.20	\$157.80
08/14/20	John E. Roberts	219	Andalusian: Call with A. Deming to discuss arguments in certiorari opposition (0.60); Analyze and outline arguments for certiorari opposition (1.90).	2.50	\$1,972.50
08/14/20	Adam L. Deming	219	Andalusian: Review and annotate Slab Fork and Travelers cases cited in the First Circuit decision and in the petition as being the source of a circuit split (1.70); Analyze how to distinguish the cases and petitioners' interpretation of how the First Circuit read them (0.80).	2.50	\$1,972.50
08/14/20	Adam L. Deming	219	Andalusian: Review and further annotate certiorari petition in order to outline response (0.90); Draft outline of responses (1.20); Conduct research regarding system enabling statute and its operation with respect to bond issuance and security interests in employer contributions (0.90); Confer with J. Roberts regarding certiorari opposition (0.60).	3.60	\$2,840.40

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Date	Timekeeper	Task	Description	Hours	Amount
08/17/20	Adam L. Deming	219	Andalusian: Review prior Puerto Rico-related certiorari oppositions for useful organizational scheme details and headings (0.40); Revise short outline draft of opposition (0.20).	0.60	\$473.40
08/18/20	Steven O. Weise	219	Andalusian: Review bondholder petition for certiorari.	2.70	\$2,130.30
08/19/20	Adam L. Deming	219	Andalusian: Conduct additional research regarding petitioner's cited conflicting cases from other circuits.	0.70	\$552.30
08/20/20	Adam L. Deming	219	Andalusian: Review and further annotate certiorari petition and decisions below.	1.90	\$1,499.10
08/20/20	Adam L. Deming	219	Andalusian: Conduct preliminary research regarding Bankruptcy Code 552's interpretation and ordinary operation.	1.10	\$867.90
08/20/20	Adam L. Deming	219	Andalusian: Review and research ways to distinguish cases cited in certiorari petition.	1.50	\$1,183.50
08/20/20	Adam L. Deming	219	Andalusian: Draft outline organizing sections of opposition to certiorari.	2.40	\$1,893.60
08/21/20	Adam L. Deming	219	Andalusian: E-mails with M. Harris regarding First Circuit opinion and corrected outline document in connection with draft outline of opposition.	0.20	\$157.80
08/21/20	Mark Harris	219	Andalusian: Review certiorari petition.	1.00	\$789.00
08/22/20	Steven O. Weise	219	Andalusian: Review bondholder petition for certiorari.	0.80	\$631.20
08/25/20	Mark Harris	219	Andalusian: Review of decision below.	0.80	\$631.20
08/27/20	John E. Roberts	219	Andalusian: Revise outline for certiorari opposition (1.20); Draft certiorari opposition (2.00).	3.20	\$2,524.80
08/27/20	Mark Harris	219	Andalusian: Draft and revise outline for certiorari opposition.	0.50	\$394.50
08/27/20	Adam L. Deming	219	Andalusian: Review First Circuit briefing (0.40); Edit outline in accordance with comments from M. Harris and J. Roberts (2.10).	2.50	\$1,972.50
08/28/20	Adam L. Deming	219	Andalusian: E-mail to J. Roberts' regarding questions about abbreviated outline regarding actuarial deficit.	0.50	\$394.50
08/28/20	John E. Roberts	219	Andalusian: Revise outline for opposition to petition for certiorari.	0.50	\$394.50
08/28/20	Jeffrey W. Levitan	219	Andalusian: Review outline of certiorari opposition, e-mail J. Roberts regarding same.	0.30	\$236.70
08/29/20	Jeffrey W. Levitan	219	Andalusian: Edit outline of certiorari opposition (2.10); Review S. Weise comments, e-mails J. Roberts regarding certiorari opposition (0.30).	2.40	\$1,893.60
08/29/20	John E. Roberts	219	Andalusian: Revise outline for opposition to petition for certiorari per comments of partners.	1.00	\$789.00
08/30/20	Mark Harris	219	Andalusian: Draft and revise outline for certiorari opposition.	0.50	\$394.50
08/31/20	John E. Roberts	219	Andalusian: Draft opposition to petition for certiorari.	3.10	\$2,445.90
Appeal				66.20	\$52,231.80
Total for Professional Services					\$52,798.80

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD
MEMBER

0048 ERS TITLE III - MISCELLANEOUS

Page 5

Timekeeper Summary

Timekeeper	Status	Hours	Rate	Value
JEFFREY W. LEVITAN	PARTNER	3.60	789.00	\$2,840.40
JOHN E. ROBERTS	PARTNER	18.40	789.00	\$14,517.60
KEVIN J. PERRA	PARTNER	1.00	789.00	\$789.00
MARGARET A. DALE	PARTNER	0.80	789.00	\$631.20
MARK HARRIS	PARTNER	4.20	789.00	\$3,313.80
STEVEN O. WEISE	PARTNER	7.30	789.00	\$5,759.70
TIMOTHY W. MUNGOVAN	PARTNER	0.50	789.00	\$394.50
Total for PARTNER		35.80		\$28,246.20
ADAM L. DEMING	ASSOCIATE	23.70	789.00	\$18,699.30
JOSHUA A. ESSES	ASSOCIATE	2.10	789.00	\$1,656.90
WILLIAM D. DALSEN	ASSOCIATE	4.60	789.00	\$3,629.40
Total for ASSOCIATE		30.40		\$23,985.60
ANGELO MONFORTE	LEGAL ASSISTANT	1.70	270.00	\$459.00
Total for LEGAL ASSISTANT		1.70		\$459.00
LAURIE A. HENDERSON	LIT. SUPPORT	0.40	270.00	\$108.00
Total for LIT. SUPPORT		0.40		\$108.00
Total		68.30		\$52,798.80

For Charges and Disbursements

Date	Timekeeper	Type	Description	Amount
08/10/2020	John E. Roberts	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$99.00
			Total for LEXIS	\$99.00

Charges and Disbursements Summary

Type of Disbursements	Amount
LEXIS	99.00
Total Expenses	\$99.00
Total Amount for this Matter	\$52,897.80

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

-----X

In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

-----X

IN RE:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3566-LTS

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO,

Debtor.

-----X

**COVER SHEET TO FORTY-SECOND MONTHLY FEE APPLICATION OF
PROSKAUER ROSE LLP AS ATTORNEYS TO THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, AS REPRESENTATIVE OF DEBTOR,
EMPLOYEES RETIREMENT SYSTEM ("ERS")
FOR THE PERIOD SEPTEMBER 1, 2020 THROUGH SEPTEMBER 30, 2020**

Name of Applicant:

Proskauer Rose LLP ("Proskauer")

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Authorized to Provide
Professional Services to:

Financial Oversight and Management Board, as
Representative for the Debtor Pursuant to
PROMESA Section 315(b)

Period for which compensation
and reimbursement for fees and services
is sought:

September 1, 2020 through September 30, 2020

Amount of compensation sought
as actual, reasonable and necessary:

\$572,702.70

Amount of expense reimbursement sought
as actual, reasonable and necessary:

\$21,992.24

Total Amount for these Invoices:

\$594,694.94

This is a: X monthly ___ interim ___ final application.

This is Proskauer's 42nd monthly fee application in these cases.

Principal Certification

I hereby authorize the submission of this Monthly Fee Statement for September 2020.

A handwritten signature in dark ink, appearing to read 'Jaime A. El Koury', is positioned above a horizontal line.

Jaime A. El Koury
General Counsel to the Financial Oversight and
Management Board for Puerto Rico

On October 5, 2020 sent to:

FOMB:

Financial Oversight and Management Board
40 Washington Square South
Office 314A
New York, NY 10012
Attn: Professor Arthur J. Gonzalez
FOMB Board Member

O'Neill & Borges LLC
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Office of United States Trustee

Office of the United States Trustee for the District of
Puerto Rico
Edificio Ochoa, 500 Tanca Street, Suite 301
San Juan, PR 00901
(In re: Commonwealth of Puerto Rico)

Office of the United States Trustee for Region 21
75 Spring Street, SW, Room 362
Atlanta, GA 30303
Attn: Guy G. Gebhardt
Acting United States Trustee (Region 21)
(In re: Commonwealth of Puerto Rico)

**Co-Counsel for the Official Committee of Unsecured
Creditors:**

Paul Hastings LLP
200 Park Avenue
New York, NY 10166
Attn: Luc. A. Despins, Esq.

Casillas, Santiago & Torres, LLC
El Caribe Office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901-2419
Attn: Juan J. Casillas Ayala, Esq.
Alberto J. E. Añeses Negrón, Esq.

Co-Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, WI 53703
Attn: Katherine Stadler

EDGE Legal Strategies, PSC
252 Ponce de León Avenue
Citibank Tower, 12th Floor
San Juan, PR 00918
Attn: Eyck O. Lugo

Co-Counsel for AAFAF:

O'Melveny & Myers LLP,
Times Square Tower
7 Times Square
New York, NY 10036
Attn: John J. Rapisardi, Esq.
Suzanne Uhland, Esq.
Diana M. Perez, Esq.

Marini Pietrantonio Muñiz LLC
MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero, Esq.

Co-Counsel for the Official Committee of Retirees:

Jenner & Block LLP
919 Third Avenue
New York, NY 10022-3908
Attn.: Robert Gordon, Esq.
Richard Levin, Esq.

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn.: Catherine Steege, Esq.
Melissa Root, Esq.

Bennazar, García & Milián, C.S.P.
Edificio Union Plaza, PH-A
416 Avenida Ponce de León
Hato Rey, PR 00918
Attn.: A.J. Bennazar-Zequeira, Esq.

Puerto Rico Department of Treasury

PO Box 9024140
San Juan, PR 00902-4140
Attn: Reylam Guerra Goderich, Deputy Assistant of
Central Accounting
Omar E. Rodríguez Pérez, CPA, Assistant
Secretary of Central Accounting
Angel L. Pantoja Rodríguez, Deputy Assistant of
Internal Revenue and Tax Policy
Francisco Parés Alicea, Assistant Secretary of
Internal Revenue and Tax Policy
Francisco Peña Montañez, CPA, Assistant
Secretary of the Treasury

Summary of Legal Fees for the Period September 2020

ERS – General			
Task Code	Matter Description	Total Billed Hours	Total Fees Requested
201	Tasks relating to the Board, its Members, its Staff, its Advisors or its Consultants	0.30	\$236.70
202	Legal Research	13.60	\$10,730.40
205	Communications with the Commonwealth and its Representatives of the Commonwealth or its Instrumentalities	0.50	\$394.50
206	Documents Filed on Behalf of the Board	205.60	\$162,218.40
207	Non-Board Court Filings	21.20	\$16,726.80
210	Analysis and Strategy	203.50	\$160,561.50
212	General Administration	163.10	\$44,037.00
218	Employment and Fee Applications	3.40	\$918.00
Total		611.20	\$395,823.30

ERS – Miscellaneous			
Task Code	Matter Description	Total Billed Hours	Total Fees Requested
212	General Administration	1.70	\$459.00
219	Appeal	223.60	\$176,420.40
Total		225.30	\$176,879.40

Summary of Legal Fees for the Period September 2020

ACROSS ALL ERS-RELATED MATTERS

Professional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Ehud Barak	Partner	BSGR & B	\$789.00	16.60	\$13,097.40
Jeffrey W. Levitan	Partner	BSGR & B	\$789.00	78.60	\$62,015.40
John E. Roberts	Partner	Litigation	\$789.00	80.90	\$63,830.10
Lary Alan Rappaport	Partner	Litigation	\$789.00	0.70	\$552.30
Margaret A. Dale	Partner	Litigation	\$789.00	41.60	\$32,822.40
Mark Harris	Partner	Litigation	\$789.00	42.60	\$33,611.40
Martin J. Bienenstock	Partner	BSGR & B	\$789.00	50.20	\$39,607.80
Michael A. Firestein	Partner	Litigation	\$789.00	1.70	\$1,341.30
Michael R. Hackett	Partner	Litigation	\$789.00	8.60	\$6,785.40
Steven O. Weise	Partner	Corporate	\$789.00	120.20	\$94,837.80
Timothy W. Mungovan	Partner	Litigation	\$789.00	0.50	\$394.50
Jennifer L. Roche	Senior Counsel	Litigation	\$789.00	65.50	\$51,679.50
Adam L. Deming	Associate	Litigation	\$789.00	36.30	\$28,640.70
Ariella Muller	Associate	Litigation	\$789.00	27.80	\$21,934.20
Joshua A. Esses	Associate	BSGR & B	\$789.00	7.70	\$6,075.30
Mee R. Kim	Associate	Litigation	\$789.00	51.40	\$40,554.60
William D. Dalsen	Associate	Litigation	\$789.00	37.40	\$29,508.60
Ehud Barak	Partner	BSGR & B	\$789.00	16.60	\$13,097.40
TOTAL				684.90	\$540,386.10

Summary of Legal Fees for the Period September 2020

Paraprofessional	Position/Title	Department	Hourly Billing Rate	Total Billed Hours	Total Compensation
Angelo Monforte	Legal Assistant	Litigation	\$270.00	5.50	\$1,485.00
Eric R. Chernus	Practice Support	Professional Resources	\$270.00	0.40	\$108.00
Joan K. Hoffman	Legal Assistant	Litigation	\$270.00	12.00	\$3,240.00
Lawrence T. Silvestro	Legal Assistant	Litigation	\$270.00	31.20	\$8,424.00
Lela Lerner	Legal Assistant	Litigation	\$270.00	1.50	\$405.00
Natasha Petrov	Legal Assistant	BSGR & B	\$270.00	3.40	\$918.00
Olaide M. Adejobi	Legal Assistant	Litigation	\$270.00	6.70	\$1,809.00
Shealeen E. Schaefer	Legal Assistant	Labor & Employment	\$270.00	107.50	\$29,025.00
TOTAL				168.20	\$45,414.00

SUMMARY OF LEGAL FEES	<u>Hours</u> 836.50	<u>Fees</u> \$572,702.70
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Summary of Disbursements for the period September 2020

ACROSS ALL ERS-RELATED MATTERS

EXPENSE CATEGORY	AMOUNTS
Lexis	\$2,809.00
Messenger/Delivery	\$80.34
Practice Support Vendors	\$6,884.90
Westlaw	\$11,786.00
Filing And Court Costs	\$62.00
Highq Licensing	\$370.00
Total	\$21,992.24

Proskauer requests payment of fees and reimbursement of expenses in accordance with the procedures set forth in the Interim Compensation Order (*i.e.*, payment of ninety percent (90%) of the compensation sought, in the amount of \$515,432.43 and reimbursement of one-hundred percent (100%) of expenses incurred, in the amount of \$21,992.24) in the total amount of \$537,424.67.

Professional Certification

I hereby certify that no public servant of the Department of Treasury is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the authorized representatives of the Financial Oversight and Management Board for Puerto Rico. The amount of this invoice is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, Proskauer Rose LLP does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900

Exhibit A

33260 FOMB

Invoice 190161908

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD
MEMBER

0007 PROMESA TITLE III: ERS

Page 1

Summary of Time Billed by Task		Hours	Value
201	Tasks relating to the Board and Associated Members	0.30	\$236.70
202	Legal Research	13.60	\$10,730.40
205	Communications with the Commonwealth and its Representatives	0.50	\$394.50
206	Documents Filed on Behalf of the Board	205.60	\$162,218.40
207	Non-Board Court Filings	21.20	\$16,726.80
210	Analysis and Strategy	203.50	\$160,561.50
212	General Administration	163.10	\$44,037.00
218	Employment and Fee Applications	3.40	\$918.00
Total		611.20	\$395,823.30

33260 FOMB

Invoice 190161908

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

Page 2

Tasks relating to the Board and Associated Members -- 201

Date	Timekeeper	Task	Description	Hours	Amount
09/04/20	Timothy W. Mungovan	201	E-mails with J. El Koury and E. Zayas regarding responding to an inquiry concerning ERS bond litigation (0.30).	0.30	\$236.70
Tasks relating to the Board and Associated Members				0.30	\$236.70

Legal Research -- 202

Date	Timekeeper	Task	Description	Hours	Amount
09/12/20	Michael R. Hackett	202	Review motions for judgment on the pleadings (1.10); Brief research regarding arguments in motions for judgment on the pleadings (0.80).	1.90	\$1,499.10
09/14/20	Michael R. Hackett	202	Continue to analyze motions for judgment on the pleadings (1.40); Brief research regarding arguments in motions for judgment on the pleadings (0.50).	1.90	\$1,499.10
09/22/20	Ariella Muller	202	Review cases cited on pp. 38 and 39 of bondholders' memorandum of law regarding contract interpretation and the official statement per J. Roche (1.50); Create outline of the cases (0.50); Distinguish cases from our specific facts (0.50).	2.50	\$1,972.50
09/26/20	Steven O. Weise	202	Review law regarding outline for brief on tracing issues and lien scope.	1.30	\$1,025.70
09/29/20	Steven O. Weise	202	Review law regarding brief on tracing issues and lien scope.	3.30	\$2,603.70
09/30/20	Steven O. Weise	202	Review law regarding brief on tracing issues and lien scope.	2.70	\$2,130.30
Legal Research				13.60	\$10,730.40

Communications with the Commonwealth and its Representatives -- 205

Date	Timekeeper	Task	Description	Hours	Amount
09/02/20	William D. Dalsen	205	Call with counsel to AAFAF regarding claims and administrative expense discovery (0.40); Correspondence with M. Dale regarding claims and administrative expense discovery (0.10).	0.50	\$394.50
Communications with the Commonwealth and its Representatives				0.50	\$394.50

Documents Filed on Behalf of the Board -- 206

Date	Timekeeper	Task	Description	Hours	Amount
09/01/20	Jennifer L. Roche	206	Revise draft ERS declaration in support of lien scope summary judgment motion (0.90); Revise draft brief (1.00); Revise proposed stipulation in support of lien scope motion (0.60); Conference and e-mails with M. Pocha regarding proposed stipulation (0.60); Conference with M. Dale regarding strategy for motion (0.30); E-mails with R. Kim and M. Dale regarding issues raised in proposed stipulation (0.20); E-mails with Committee counsel regarding summary judgment issues (0.10); E-mail with S. Weise regarding open issues in lien scope summary judgment motion (0.20).	3.90	\$3,077.10
09/01/20	Jeffrey W. Levitan	206	E-mails with M. Dale regarding ultra vires (0.20); Revise lien scope summary judgment brief (4.40); Review draft Tirado declaration, O'Melveny comments to draft fact stipulation (0.30); E-mails with M. Bienenstock, J. Roche, and teleconference M. Dale regarding lien scope (0.50).	5.40	\$4,260.60
09/01/20	Steven O. Weise	206	Review revised draft brief on tracing and perfection issues.	3.30	\$2,603.70
09/02/20	Steven O. Weise	206	Review brief on avoiding bonds for exceeding statutory authority.	3.80	\$2,998.20
09/02/20	Jennifer L. Roche	206	Revise draft proposed stipulation of facts (0.30); E-mail with bondholders' counsel regarding stipulation (0.10); E-mail with A. Muller regarding Section 926 argument (0.10); E-mails with M. Dale and S. Weise regarding ultra vires arguments (0.10); E-mails with W. Dalsen regarding lien scope motion and stipulation (0.10).	0.70	\$552.30
09/02/20	Jeffrey W. Levitan	206	Review final draft of lien scope, prepare issues list (1.20); Review revisions regarding fact stipulation (0.30); Review revised ultra vires brief (1.10); E-mails with J. Roche S. Weise regarding summary judgment briefs (0.20).	2.80	\$2,209.20
09/02/20	Ehud Barak	206	Review and revise the ERS lien scope motion for summary judgment.	2.70	\$2,130.30
09/03/20	Martin J. Bienenstock	206	Review, revise, research and draft portions of summary judgment motion (8.40).	8.40	\$6,627.60
09/03/20	Ehud Barak	206	Review and revise the ERS lien scope motion for summary judgment.	2.90	\$2,288.10

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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Date	Timekeeper	Task	Description	Hours	Amount
09/03/20	Steven O. Weise	206	Review brief on avoiding bonds for exceeding statutory authority.	2.70	\$2,130.30
09/03/20	William D. Dalsen	206	Review draft brief on ultra vires issues (0.50); Call with counsel to SCC regarding summary judgment briefing (0.80); Call with M. Dale regarding summary judgment briefing (0.10).	1.40	\$1,104.60
09/04/20	Steven O. Weise	206	Review brief on avoiding bonds for exceeding statutory authority.	8.30	\$6,548.70
09/04/20	Martin J. Bienenstock	206	Review, revise, draft portions of statement of undisputed facts (6.80).	6.80	\$5,365.20
09/04/20	Ehud Barak	206	Review and revise the ERS lien scope motion for summary judgment.	1.20	\$946.80
09/04/20	Ariella Muller	206	Draft declaration in support of motion for summary judgement per J. Roche (1.40).	1.40	\$1,104.60
09/05/20	Steven O. Weise	206	Review brief on avoiding bonds for exceeding statutory authority.	7.50	\$5,917.50
09/06/20	Steven O. Weise	206	Review brief on avoiding bonds for exceeding statutory authority.	9.40	\$7,416.60
09/06/20	Jennifer L. Roche	206	Review and revise draft declaration in support of summary judgment motion (1.10); E-mails with A. Muller regarding same (0.10).	1.20	\$946.80
09/07/20	Jennifer L. Roche	206	Review and revise statement of facts in support of motion for summary judgment (1.50); E-mails with W. Dalsen and M. Dale regarding statement of facts approach (0.40); Conference with M. Dale regarding statement of facts issues (0.20).	2.10	\$1,656.90
09/07/20	Steven O. Weise	206	Review brief on avoiding bonds for exceeding statutory authority.	10.60	\$8,363.40
09/07/20	Martin J. Bienenstock	206	Review and revise portion of ERS reply brief regarding security interests of bondholders.	5.60	\$4,418.40
09/07/20	Ariella Muller	206	Draft declaration in support of ERS motion for summary judgement per J. Roche (0.40).	0.40	\$315.60
09/08/20	Ehud Barak	206	Review and revise the lien scope summary judgment motion (1.80); Review related documents (0.80).	2.60	\$2,051.40
09/08/20	Martin J. Bienenstock	206	Review and revise summary judgment brief regarding security interests of Bondholders.	7.80	\$6,154.20
09/08/20	Steven O. Weise	206	Review revised draft brief on tracing and perfection issues.	2.60	\$2,051.40

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Invoice 190161908

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

Page 5

Date	Timekeeper	Task	Description	Hours	Amount
09/08/20	Jennifer L. Roche	206	Conference with M. Dale and team regarding arguments in ultra vires summary judgment motion (1.00); Revise summary judgment motion (0.70); Revise ERS declaration (0.30); Revise attorney declaration in support of motion (0.80); Analysis regarding Brattle comments on summary judgment brief and issues (1.10); Revise statement of facts (1.20); Conference with litigation team regarding ERS case strategy and issues (0.60).	5.70	\$4,497.30
09/09/20	Jennifer L. Roche	206	Revise ERS declaration (0.30); E-mail with M. Pocha regarding same (0.20); Conference with M. Pocha regarding draft summary judgment brief (0.50); Revise brief (2.20); Revise statement of facts (2.10); Conference and e-mails with L. Silvestro regarding cite-checking and question on brief (0.30); E-mail S. Schaefer regarding exhibits for brief (0.10); E-mails with S. Weise and R. Kim regarding perfection issue (0.30); E-mails with W. Dalsen, J. Levitan, M. Dale and W. Dalsen regarding ultra vires arguments (0.50); E-mails with W. Dalsen and R. Kim regarding production issues (0.10).	6.60	\$5,207.40
09/09/20	Ariella Muller	206	Draft joint motion to exceed the page limits for ERS motion of partial summary judgement per W. Dalsen (2.90).	2.90	\$2,288.10
09/09/20	Ehud Barak	206	Review M. Bienenstock's comments to the lien scope brief (2.70); Discuss same with J. Levitan (0.20).	2.90	\$2,288.10
09/09/20	William D. Dalsen	206	Review draft summary judgment brief on ultra vires issues (1.70).	1.70	\$1,341.30
09/10/20	William D. Dalsen	206	Revise draft joint motion to extend page limits for ultra vires and lien scope summary judgment briefs (0.60); Revise draft summary judgment brief on ultra vires issues (0.90); Review proposed edits to lien scope summary judgment brief (0.10).	1.60	\$1,262.40
09/10/20	Ariella Muller	206	Draft joint motion to exceed the page limits for ERS motion of partial summary judgement per W. Dalsen (0.20); Cite-check motion for summary judgement (1.50).	1.70	\$1,341.30
09/10/20	Michael A. Firestein	206	Review urgent motion on summary judgment concerning ultra vires issues (0.20).	0.20	\$157.80
09/10/20	Steven O. Weise	206	Review revisions to brief on avoiding bonds for exceeding statutory authority.	4.70	\$3,708.30

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PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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Date	Timekeeper	Task	Description	Hours	Amount
09/10/20	Steven O. Weise	206	Review revised draft brief on tracing and perfection issues.	3.20	\$2,524.80
09/10/20	Jennifer L. Roche	206	Revise brief and statement of facts in support of motion for summary judgment (3.50); Analyze Retiree Committee comments to brief (0.60); E-mails with J. Levitan, M. Dale and S. Weise regarding issues in brief (0.30); Review exhibits for summary judgment motion (0.80); E-mails with L. Silvestro and S. Schaefer regarding finalizing material for brief (0.30); E-mail local counsel regarding motion and supporting documents (0.20); E-mails with M. Pocha regarding declaration and argument in brief (0.20); Analyze M. Bienenstock comments on statement of facts (0.20); E-mails with M. Dale regarding statement of facts (0.10); E-mails with W. Dalsen and M. Dale regarding motion to exceed pages (0.10).	6.30	\$4,970.70
09/11/20	Ariella Muller	206	Review and revise motion for summary judgement per J. Roche (2.30).	2.30	\$1,814.70
09/11/20	Steven O. Weise	206	Review revisions to brief on avoiding bonds for exceeding statutory authority.	1.30	\$1,025.70
09/11/20	Steven O. Weise	206	Review and revise draft brief on tracing and perfection issues.	1.40	\$1,104.60
09/11/20	Jeffrey W. Levitan	206	Review proposed revisions to ultra vires brief (0.70); Review ultra vires statement of facts (0.40); Review e-mails regarding comments on ultra vires brief (0.20); Review comments to lien scope brief (0.60); E-mails with J. Roche regarding revisions to lien scope brief (0.50); Review page limits order (0.10); E-mails with J. Roche regarding filing issues (0.20); Teleconference with M. Dale, and e-mails with W. Dalsen and S. Weise regarding liens cope and ultra vires briefs (0.50); Review revised ultra vires brief (1.40).	4.60	\$3,629.40
09/11/20	Jennifer L. Roche	206	Finalize lien scope summary judgment briefing (4.20); Coordinate filing with L. Silvestro and local counsel (0.40).	4.60	\$3,629.40
09/12/20	Lary Alan Rappaport	206	Review summary judgment motions, supporting documents (0.70).	0.70	\$552.30
09/12/20	Michael A. Firestein	206	Partial review of Board summary judgment motion (0.40).	0.40	\$315.60

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Invoice 190161908

PROFESSOR ARTHUR J. GONZALEZ, FOMB BOARD

MEMBER

0007 PROMESA TITLE III: ERS

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Date	Timekeeper	Task	Description	Hours	Amount
09/12/20	Jeffrey W. Levitan	206	E-mails with W. Dalsen regarding briefs, review index of pleadings, and e-mails with E. Barak regarding summary judgment briefs (0.50); Review fiscal agent ultra vires brief (1.60); Review fiscal agent ultra vires statement of facts (0.40); Review bondholders lien scope brief (1.80); Review bondholders ultra vires brief (1.40); E-mails with M. Dale regarding opposition briefs (0.20).	5.90	\$4,655.10
09/14/20	Jeffrey W. Levitan	206	Review bondholder fact statement (0.40); Telephone conference M. Dale, and e-mails with W. Dalsen and S. Weise regarding summary judgment motions (0.50); Review draft discovery response, and e-mails with W. Dalsen regarding same (0.20); Teleconference J. Esses regarding 552 issues, lien scope, and review committee e-mails regarding ultra vires (0.30).	1.40	\$1,104.60
09/19/20	Jennifer L. Roche	206	Analysis and outline opposition to lien scope summary judgment.	1.40	\$1,104.60
09/21/20	Jennifer L. Roche	206	Conference with M. Dale and litigation team regarding status and strategy (0.40); Draft outline for opposition to lien scope summary judgment motion (4.50).	4.90	\$3,866.10
09/21/20	Steven O. Weise	206	Review outline of response to bondholder briefs on tracing and perfection issues.	1.30	\$1,025.70
09/21/20	Joshua A. Esses	206	Review outline reply to lien scope summary judgment matter.	0.30	\$236.70
09/22/20	Joshua A. Esses	206	Review outline on ERS summary judgment reply.	0.90	\$710.10
09/22/20	Jeffrey W. Levitan	206	Review e-mails regarding discovery (0.10); Edit outline of lien scope summary judgment (1.80).	1.90	\$1,499.10
09/24/20	Jennifer L. Roche	206	Review analysis regarding official statement and contract interpretation (0.30); Draft opposition to lien scope summary judgment motion (2.20).	2.50	\$1,972.50
09/25/20	Jennifer L. Roche	206	Conference with M. Dale, J. Levitan, S. Weise, R. Kim, W. Dalsen, A. Muller and J. Esses regarding opposition to bondholder lien scope summary judgment (1.10); Analysis regarding S. Weise and J. Levitan comments to outline for opposition brief (0.80); Revise outline for opposition to summary judgment (0.40).	2.30	\$1,814.70

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Date	Timekeeper	Task	Description	Hours	Amount
09/25/20	Jeffrey W. Levitan	206	E-mail M. Harris regarding 552 (0.10); Prepare outline of response to bondholders' summary judgment motion (2.90); Review S. Weise revisions to outline of summary judgment response (0.30); E-mails J. Roche regarding summary judgment response (0.30); Participate in call with J. Roche and team regarding summary judgment response (1.10); E-mail M. Dale regarding summary judgment (0.10).	4.80	\$3,787.20
09/25/20	Joshua A. Esses	206	Call with J. Roche and team on reply in ERS summary judgment lien scope reply.	1.10	\$867.90
09/25/20	Steven O. Weise	206	Review revised draft brief on tracing and perfection issues.	3.70	\$2,919.30
09/27/20	Jennifer L. Roche	206	Draft opposition to lien scope summary judgment motion.	2.30	\$1,814.70
09/28/20	Jennifer L. Roche	206	Draft opposition to lien scope summary judgment motion (2.50); E-mail with A. Muller regarding summary judgment issues (0.20).	2.70	\$2,130.30
09/29/20	Jennifer L. Roche	206	Draft opposition to lien scope summary judgment motion.	3.50	\$2,761.50
09/29/20	Joshua A. Esses	206	Review analysis on reply to bondholders' summary judgment response.	0.10	\$78.90
09/30/20	Ariella Muller	206	Draft outline of responsive argument on the Section 544 issue for our opposition to bondholders motion for summary judgment per J. Roche (1.50).	1.50	\$1,183.50
09/30/20	Joshua A. Esses	206	Review reply to response to ERS motion for summary judgment in lien scope adversary proceeding.	0.40	\$315.60
09/30/20	Jennifer L. Roche	206	Draft opposition to lien scope summary judgment motion.	4.40	\$3,471.60
Documents Filed on Behalf of the Board				205.60	\$162,218.40

Non-Board Court Filings -- 207

Date	Timekeeper	Task	Description	Hours	Amount
09/03/20	Ariella Muller	207	Review hearing recording to identify arguments made regarding UCC 9-332 per J. Roche (1.00); Draft summary of arguments made regarding UCC 9-332 (0.30).	1.30	\$1,025.70
09/04/20	Michael A. Firestein	207	Review orders in Court of Claims and supplemental pleadings by the United States regarding amended complaint and motions to dismiss (0.20).	0.20	\$157.80

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Date	Timekeeper	Task	Description	Hours	Amount
09/12/20	Michael A. Firestein	207	Partial review of UCC's summary judgment motion (0.40); Partial review of BNY's summary judgment motion (0.30).	0.70	\$552.30
09/13/20	Michael R. Hackett	207	Continue to analyze motions for judgment on the pleadings (0.90).	0.90	\$710.10
09/14/20	Steven O. Weise	207	Review BNY brief on avoiding bonds for exceeding statutory authority.	2.20	\$1,735.80
09/15/20	Michael R. Hackett	207	Continue to analyze motions for judgment on the pleadings (1.90); Review filings in underlying case (0.80).	2.70	\$2,130.30
09/15/20	Joshua A. Esses	207	Review bondholder summary judgment lien scope response (0.50).	0.50	\$394.50
09/15/20	Mee R. Kim	207	Review bondholder filing on summary judgment (1.00); Teleconference with M. Dale and Proskauer team regarding same (1.00).	2.00	\$1,578.00
09/16/20	Mee R. Kim	207	Review bondholder filing on summary judgment (0.70).	0.70	\$552.30
09/16/20	Steven O. Weise	207	Review BNY brief on avoiding bonds for exceeding statutory authority.	2.90	\$2,288.10
09/18/20	Ariella Muller	207	Analyze bondholders opposition brief to identify cases that we need to distinguish per J. Roche.	1.00	\$789.00
09/24/20	Jeffrey W. Levitan	207	Analyze bondholders summary judgment motion and outline responses.	4.80	\$3,787.20
09/26/20	Jeffrey W. Levitan	207	Analyze First Circuit 552 decision to apply to lien scope.	0.70	\$552.30
09/29/20	Ariella Muller	207	Review previous arguments made by bondholders on Section 544 issue in 213 case (0.20); Analyze Court's previous ruling on the 544 issue (0.40).	0.60	\$473.40
Non-Board Court Filings				21.20	\$16,726.80

Analysis and Strategy -- 210

Date	Timekeeper	Task	Description	Hours	Amount
09/01/20	Mee R. Kim	210	E-mails with J. Roche regarding motion for summary judgment strategy (0.10); Review document regarding same (1.30); E-mails with M. Dale and Proskauer team regarding same (1.80); E-mails with M. Dale, J. Roche and M. Pocha regarding same (0.10); E-mails with M. Dale and Board advisors regarding same (0.20); E-mails with M. Dale, Proskauer team and common interest team regarding same (0.10).	3.60	\$2,840.40
09/01/20	Joshua A. Esses	210	Review e-mails regarding lien scope summary judgment motion.	0.10	\$78.90

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Date	Timekeeper	Task	Description	Hours	Amount
09/01/20	Margaret A. Dale	210	Review revised draft of summary judgment motion and declaration in support (0.90); Review draft of Tirado declaration (0.30); Teleconference with J. Roche regarding logistics (0.30); Teleconference with J. Levitan regarding logistics (0.20); E-mails with M. Pocha, J. Roche and R. Kim regarding proposed stipulated facts (0.20).	1.90	\$1,499.10
09/01/20	William D. Dalsen	210	Review responses and objections to claimants' discovery requests in claims and administrative expense proceedings (0.50).	0.50	\$394.50
09/02/20	William D. Dalsen	210	Correspondence with UCC and Retiree Committee regarding summary judgment briefing (0.50); Review discovery requests and responses in claims/administrative expense proceedings (0.50); Call with counsel to AAFAF regarding claims/administrative expense discovery (0.40); Correspondence with M. Dale regarding claims/administrative expense discovery (0.50).	1.90	\$1,499.10
09/02/20	Margaret A. Dale	210	E-mails with P. Friedman and J. Roche regarding proposed stipulated facts (0.20); E-mails with counsel for Committees, AAFAF and W. Dalsen regarding ultra vires summary judgment motion (0.20); E-mails with S. Weise regarding comments on draft ultra vires summary judgment motion (0.20); Review revised stipulated fact statement based on O'Melveny's input (0.20); E-mails with J. Roche and S. Sooknanan regarding draft stipulated facts (0.20).	1.00	\$789.00
09/02/20	Mee R. Kim	210	E-mails with M. Dale, Proskauer team and common interest team regarding summary judgment motion (0.20); E-mails with M. Dale and Proskauer team regarding same (0.20); E-mails with Board consultants regarding same (0.30).	0.70	\$552.30

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Date	Timekeeper	Task	Description	Hours	Amount
09/03/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding lien scope summary judgment motion (1.50); Review documents regarding same (0.30); E-mails with Board consultants regarding same (0.10); E-mails with J. Roche regarding same (0.20); E-mails with J. Roche and S. Schaefer regarding same (0.20); E-mails with M. Dale and Proskauer team regarding ultra vires summary judgment motion (0.10).	2.40	\$1,893.60
09/03/20	Margaret A. Dale	210	Teleconference with C. Di Pompeo regarding discovery requests in connection with administrative expense motion (0.30); Conference call with T. Axelrod and W. Dalsen regarding ultra vires summary judgment motion (0.50); Review draft of draft ultra vires summary judgment motion (2.50); Conference call with J. Levitan regarding open issues with summary judgment motions (0.30); E-mails with W. Dalsen, R. Kim and M. Pocha regarding bondholders' request for redaction of confidential information in connection with summary judgment motions (0.20); E-mails regarding \$190.5 mm in transferred assets and treatment of same (0.20).	4.00	\$3,156.00
09/03/20	Steven O. Weise	210	Review issues on tracing and perfection.	1.70	\$1,341.30
09/03/20	Jennifer L. Roche	210	E-mails with W. Dalsen regarding confidential documents for summary judgment motions (0.20); Analysis regarding Section 926 argument and UCC issue (0.30); Draft notice of motion and proposed order for summary judgment (1.60); Analysis regarding Bondholders identified exhibits and potential confidential documents for lien scope summary judgment motion (1.70); E-mails with R. Kim, S. Weise, J. Levitan and M. Dale regarding lien scope issues (0.20); Revise draft proposed stipulation (0.10); E-mails with A. Muller regarding attorney declaration in support of summary judgment (0.10).	4.20	\$3,313.80

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Date	Timekeeper	Task	Description	Hours	Amount
09/03/20	Jeffrey W. Levitan	210	Review Conway McKenzie report (0.90); Review e-mails regarding confidential documents (0.20); Review e-mails regarding UCC issues and e-mail S. Weise regarding same (0.20); Teleconference M. Dale regarding ultra vires issues, discovery (0.30); Analysis of bondholder recoveries (0.50); E-mail R. Kim regarding same (0.30).	2.40	\$1,893.60
09/04/20	Jeffrey W. Levitan	210	Review orders, e-mail regarding Court of Claims litigation (0.30); Review decision on tracing (0.30); E-mail S. Weise regarding same (0.30); Review N. Bassett e-mail regarding ultra vires (0.10); Review ultra vires draft brief to prepare for call with committees (0.60); Participate in call with committees regarding ultra vires (0.80).	2.40	\$1,893.60
09/04/20	Margaret A. Dale	210	Review N. Bassett e-mail regarding issues with ultra vires summary judgment brief (0.30); Conference call with counsel for Committees, AAFAF and J. Levitan and W. Dalsen regarding draft of ultra vires summary judgment motion (0.80).	1.10	\$867.90
09/04/20	Timothy W. Mungovan	210	E-mails with K. Perra and M. Dale regarding amended complaint at Court of Federal Claims (0.20).	0.20	\$157.80
09/04/20	Jennifer L. Roche	210	Conference with Committee counsel regarding ultra vires and lien scope summary judgment motions (0.80); E-mails with M. Pocha regarding ERS declaration (0.10); E-mails with S. Schaefer regarding summary judgment exhibits (0.10).	1.00	\$789.00
09/04/20	William D. Dalsen	210	Correspondence with M. Dale and J. Levitan regarding Court of Federal Claims case (0.30); Call with committees regarding summary judgment briefing (0.80); Correspondence with Committees regarding ultra vires summary judgment briefing (0.60).	1.70	\$1,341.30
09/06/20	William D. Dalsen	210	Correspondence with counsel to AAFAF regarding summary judgment briefing (0.10); Correspondence with M. Dale and J. Roche regarding summary judgment briefing (0.20).	0.30	\$236.70
09/07/20	William D. Dalsen	210	Correspondence with Committees regarding motions for summary judgment (0.20); Correspondence with M. Dale and J. Roche regarding motions for summary judgment (0.20).	0.40	\$315.60

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09/07/20	Mee R. Kim	210	E-mail with M. Dale and Proskauer team regarding motion for summary judgment draft.	0.10	\$78.90
09/07/20	Margaret A. Dale	210	Review M. Bienenstock edits to separate statement of material facts (0.40); E-mails with J. Roche and W. Dalsen regarding same (0.20); Review Rule 56 and local rules regarding summary judgment motions (0.40); Teleconference with J. Roche regarding summary judgment rules (0.20); Draft e-mail to M. Bienenstock regarding edits, format for Rule 56.1 statement and examples (0.50).	1.70	\$1,341.30
09/08/20	Margaret A. Dale	210	E-mails with counsel for Retirees and M. Bienenstock regarding timing of draft lien scope summary judgment brief (0.20); E-mails with W. Dalsen and R. Holm regarding motion to seal certain confidential exhibits (0.20); E-mails with J. Levitan and S. Weise regarding comments on ultra vires summary judgment motion related to UCC (0.20); E-mails with J. Roche regarding stipulation with bondholders regarding undisputed facts (0.20); E-mails with W. Dalsen and bondholder counsel at Jones Day regarding logistics related to summary judgment motions (0.20); Review S. Weise analysis of ultra vires summary judgment brief (0.80); Conference call with litigation team regarding issues related to finalizing summary judgment briefs (0.60); Conference call with S. Weise, J. Levitan, J. Roche, W. Dalsen, and A. Muller regarding UCC issues in ultra vires brief (1.00); Review and revise e-mail to Committees regarding UCC issues in ultra vires brief (0.80).	4.20	\$3,313.80

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Date	Timekeeper	Task	Description	Hours	Amount
09/08/20	William D. Dalsen	210	Correspondence with counsel to ERS Bondholders regarding redactions and page limitations for summary judgment briefing (0.50); Correspondence with counsel to AAFAF regarding redactions for summary judgment briefing (0.10); Correspondence with counsel to Retiree Committee and UCC regarding summary judgment briefing (0.20); Call with counsel to ERS Bondholders regarding summary judgment filings (0.50); Correspondence with team regarding summary judgment page limitation motion and motion to seal (0.50); Call with M. Dale regarding ERS case status (0.60); Call with Committees regarding summary judgment briefing (1.00); Correspondence with counsel to ERS Bondholders regarding page limits and redactions for motions for summary judgment (0.30); Review draft brief in support of motion for summary judgment on ultra vires issues (1.40).	5.10	\$4,023.90
09/08/20	Ariella Muller	210	Attend ERS team meeting with M. Dale to discuss upcoming motion for summary judgement and updates on the case.	0.70	\$552.30
09/08/20	Mee R. Kim	210	Videoconference with M. Dale and Proskauer team regarding motion for summary judgment draft (0.60); E-mails with M. Dale and Proskauer team regarding strategy regarding same (1.60); E-mails with Brattle team regarding same (0.80); E-mails with W. Dalsen regarding same (0.20); Review draft memoranda regarding same (2.20); E-mails with W. Dalsen and Proskauer team regarding same (0.60); E-mails with J. Roche regarding same (0.20).	6.20	\$4,891.80
09/08/20	Steven O. Weise	210	Review revisions to brief on avoiding bonds for exceeding statutory authority.	3.80	\$2,998.20

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Date	Timekeeper	Task	Description	Hours	Amount
09/08/20	Jeffrey W. Levitan	210	Teleconference and e-mails with M. Dale regarding lien scope and ultra vires (0.40); Review C. Steege e-mails regarding lien scope, e-mail P. Friedman regarding 552, e-mail E. Barak regarding ultra vires (0.50); Review comments and e-mails regarding statement of undisputed facts (0.40); Analysis of draft ultra vires briefs (1.60); E-mails with S. Weise regarding ultra vires issues (0.40); E-mail W. Dalsen regarding expert reports (0.10); Participate in call with S. Weise and team regarding ultra vires (1.10); Review Brattle comments to lien scope brief (0.40); Review draft e-mail to committees regarding ultra vires brief, e-mails W. Dalsen regarding same (0.40).	5.30	\$4,181.70
09/09/20	Steven O. Weise	210	Review revisions to brief on avoiding bonds for exceeding statutory authority.	1.20	\$946.80
09/09/20	Steven O. Weise	210	Review revisions to brief on avoiding bonds for exceeding statutory authority.	4.30	\$3,392.70
09/09/20	Jeffrey W. Levitan	210	Review internal comments to lien scope brief, and e-mail J. Roche regarding revisions (0.50); Review revised ultra vires memorandum to committees (0.30); Review proposed revisions to lien scope brief to address Brattle comments (0.60); Participate in call with M. Dale and committee counsel regarding ultra vires brief (0.80); Follow-up call with M. Dale and committees regarding ultra vires (0.40); Review revised ultra vires brief (0.70); Teleconferences E. Barak, M. Dale regarding summary judgment briefs (0.50); E-mails with S. Weise J. Esses regarding ultra vires issues (0.30); E-mails with W. Dalsen regarding lien scope (0.20).	4.30	\$3,392.70
09/09/20	Jeffrey W. Levitan	210	Review revised creditors' committee ultra vires brief (1.30); Teleconference and e-mails M. Dale regular ultra vires issues (0.50).	1.80	\$1,420.20

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Date	Timekeeper	Task	Description	Hours	Amount
09/09/20	William D. Dalsen	210	Correspondence with counsel to Retiree Committee and UCC regarding ultra vires summary judgment briefing (1.00); Correspondence with M. Dale regarding ERS summary judgment briefing (0.20); Call with counsel to UCC and Retiree Committee regarding lien scope summary judgment issues (1.00); Correspondence with counsel to Bondholders regarding redactions for summary judgment filing (0.30); Call with counsel to UCC and Retiree Committee regarding strategy for ultra vires summary judgment brief (1.00); Analysis of draft ultra vires brief from Committees (0.40); Correspondence with team regarding summary judgment brief (0.30).	4.20	\$3,313.80
09/09/20	Margaret A. Dale	210	Review M. Bienenstock edits to lien scope summary judgment brief (0.30); Conference call with Common Interest parties regarding UCC issues related to ultra vires brief (0.50); Multiple e-mails with J. Levitan, S. Weise, and W. Dalsen regarding edits to ultra vires brief (1.50); Conference call with Common Interest parties regarding strategy decisions involving ultra vires brief (0.40); E-mails with J. Roche regarding lien scope summary judgment motion and supporting papers (0.80); Review and revise lien scope summary judgment motion, memorandum of law, separate statement of facts and C. Tirado declaration (2.50).	6.00	\$4,734.00
09/09/20	Joshua A. Esses	210	Call with M. Dale on ERS ultra vires brief (0.20); Review e-mails regarding same (0.20); Review docket on ERS ultra vires brief (0.20).	0.60	\$473.40
09/09/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding motion for draft summary judgment (2.10); E-mails with Brattle team regarding same (0.70); Review draft memoranda regarding same (1.20); E-mails with W. Dalsen and Proskauer team regarding same (0.40); E-mails with J. Roche regarding same (0.20); E-mails with S. Weise and J. Roche regarding same (0.10); E-mails with bondholder team regarding deposition errata (0.10).	4.80	\$3,787.20

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Date	Timekeeper	Task	Description	Hours	Amount
09/10/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding motion for draft summary judgment (0.80); E-mails with W. Dalsen regarding same (0.30); E-mails with Brattle team regarding same (0.20); Review draft memoranda regarding same (0.50).	1.80	\$1,420.20
09/10/20	Margaret A. Dale	210	Multiple e-mails with S. Weise, J. Levitan and W. Dalsen regarding ultra vires draft brief and edits to same (0.80); Conference call with S. Weise, J. Levitan and W. Dalsen regarding ultra vires draft brief (0.40); Conference call with J. Levitan, W. Dalsen and T. Axelrod (counsel to Board Special Committee) regarding 8-202 argument and ultra vires brief (0.30); Review M. Bienenstock comments to Rule 56.1 statement (0.20); E-mails with J. Roche regarding 56.1 statement (0.20); Review and revise ultra vires brief in support of summary judgment (0.90).	2.80	\$2,209.20
09/10/20	Ehud Barak	210	Multiple calls with J. Levitan regarding ERS' ultra vires (0.50); Review and revise the brief (2.80).	3.30	\$2,603.70
09/10/20	William D. Dalsen	210	Correspondence with J. Levitan regarding ultra vires summary judgment brief (0.30); Call with S. Weise and J. Levitan regarding ultra vires brief (0.50); Call with counsel to SCC regarding ultra vires brief (0.30); Call with J. Levitan regarding edits to ultra vires brief (0.30); Correspondence with R. Kim regarding deposition errata sheets (0.20); Correspondence with counsel to ERS Bondholders regarding joint motion to extend page limits (0.30); Correspondence with Committees regarding potential motion to seal (0.20).	2.10	\$1,656.90
09/10/20	Michael A. Firestein	210	Telephone conference with J. Levitan on co-movant issues regarding summary judgment (0.20).	0.20	\$157.80

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Date	Timekeeper	Task	Description	Hours	Amount
09/10/20	Jeffrey W. Levitan	210	Review GO claim objection provided by T. Axelrod (0.70); E-mails with T. Axelrod regarding ultra vires brief (0.30); Review Applied Theory case regarding committee standing, and e-mails with S. Weise regarding committee issues (0.50); Review M. Dale comments to ultra vires brief (0.80); Review S. Weise comments to ultra vires brief (0.60); E-mails with W. Dalsen regarding ultra vires brief (0.50); Conference S. Weise, M. Dale, W. Dalsen regarding ultra vires (0.80); Teleconference T. Axelrod and team regarding ultra vires brief (0.30); Review PREPA pleadings on committee standing (0.70); Teleconferences with E. Barak regarding committee issues (0.40); Review revised ultra vires brief (1.60); Teleconference W. Dalsen regarding revisions to ultra vires brief (0.30); Review revised lien scope brief (0.70); Review Tirado declaration (0.20); Review revised statement of facts (0.30); E-mails with J. Roche regarding lien scope pleadings (0.40).	9.10	\$7,179.90
09/11/20	William D. Dalsen	210	Call with counsel to ERS Bondholders regarding motion to seal (0.20); Correspondence with counsel to UCC regarding motions to seal (0.40); Correspondence with J. Roche regarding preparation of summary judgment filing today (0.30); Correspondence with team regarding discovery requests pertaining to claims and administrative expense motions (0.30).	1.20	\$946.80
09/11/20	Margaret A. Dale	210	Multiple communications with J. Levitan, S. Weise and J. Roche to finalize lien scope summary judgment motion (0.80); Review, revise and finalize lien scope summary judgment motion (1.20); Final review of ultra vires summary judgment brief (0.80); Multiple communications with J. Roche regarding finalizing lien scope summary judgment (0.50).	3.30	\$2,603.70
09/11/20	Mee R. Kim	210	E-mails with Brattle team regarding motion for draft deposition errata (0.10); E-mails with W. Dalsen and Proskauer team regarding same (0.40); Draft memorandum regarding same (0.30).	0.80	\$631.20

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Date	Timekeeper	Task	Description	Hours	Amount
09/12/20	William D. Dalsen	210	Correspondence with M. Dale and O. Adejobi regarding summary judgment briefing (0.20).	0.20	\$157.80
09/12/20	Mee R. Kim	210	E-mails with M. Dale regarding summary judgment motion filing (0.10); E-mails with J. Roche and W. Dalsen regarding same (0.10); E-mails with Brattle team regarding same (0.20); E-mail with W. Dalsen regarding transcript errata (0.10); E-mail with Brattle team regarding same (0.10).	0.60	\$473.40
09/12/20	Margaret A. Dale	210	E-mails with Proskauer team regarding bondholder motions for summary judgment (0.30).	0.30	\$236.70
09/13/20	Mee R. Kim	210	E-mails with Brattle team regarding transcript errata (0.30); Review documents regarding same (0.30); E-mails with W. Dalsen and Proskauer team regarding same (0.20).	0.80	\$631.20
09/13/20	Jennifer L. Roche	210	E-mails with W. Dalsen and S. Shaffer regarding summary judgment filings.	0.10	\$78.90
09/14/20	Jennifer L. Roche	210	Analysis regarding Bondholders lien scope summary judgment motion (1.50); Conference with ERS litigation team regarding strategy (0.40).	1.90	\$1,499.10
09/14/20	William D. Dalsen	210	Review draft correspondence to ERS Bondholders regarding claims and administrative expense discovery (0.40); Review prior discovery responses and objections to claims and administrative expense discovery (0.50); Call with team regarding summary judgment briefing, case status, and next steps (0.40); Correspondence with M. Dale and J. Levitan regarding summary judgment briefing (0.30); Call with counsel to AAFAF regarding claims and administrative expense discovery (0.50).	2.10	\$1,656.90
09/14/20	Margaret A. Dale	210	Teleconference with J. Levitan regarding bondholder lien scope motion for summary judgment (0.20); Conference call with Proskauer litigation team to discuss next steps regarding opposition to bondholder summary judgment motions (0.40); Review and revise letter to bondholders regarding additional discovery related to admin expense claims (0.20); Review bondholder lien scope motion for summary judgment (partial) (1.00).	1.80	\$1,420.20
09/14/20	Ariella Muller	210	Participate in meeting with M. Dale and team regarding status and strategy (0.40).	0.40	\$315.60

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Date	Timekeeper	Task	Description	Hours	Amount
09/14/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding summary judgment reply strategy (0.10); E-mails with W. Dalsen and litigation parties regarding P. Hinton transcript errata (0.10).	0.20	\$157.80
09/15/20	Ehud Barak	210	Call with ERS team regarding lien scope summary judgment.	1.00	\$789.00
09/15/20	Ariella Muller	210	Call to discuss bondholders opposition with. M. Dale, S. Weise, J. Levitan, J. Roche (1.00).	1.00	\$789.00
09/15/20	Margaret A. Dale	210	Review bondholder lien scope motion for summary judgment (partial) (1.50); Review bondholder discovery requests related to administrative expense claims to prepare for meet and confer (0.50); Teleconference with W. Dalsen regarding bondholder discovery requests related to administrative expense claims (0.20); Meet and confer with bondholder counsel, W. Dalsen, and counsel for AAFAF (0.40); Conference call with J. Levitan, S. Weise, E. Barak, J. Roche, R. Kim and A. Muller regarding bondholder lien scope summary judgment brief and opposition to same (1.00).	3.60	\$2,840.40
09/15/20	William D. Dalsen	210	Correspondence with A. Muller and S. Schaefer regarding prior discovery responses and productions (0.40); Call with counsel to ERS Bondholders regarding claims and administrative expense discovery (0.40); Review motion of the United States to dismiss ERS Bondholders' complaint in Court of Federal Claims (1.20).	2.00	\$1,578.00
09/15/20	Jennifer L. Roche	210	Conference with M. Dale, J. Levitan, S. Weise and R. Kim regarding lien scope summary judgment opposition brief.	1.00	\$789.00
09/15/20	Steven O. Weise	210	Review bondholder briefs on tracing and perfection issues.	2.80	\$2,209.20
09/15/20	Jeffrey W. Levitan	210	Review US motion to dismiss Court of Claims action (1.60); E-mails with J. Esses regarding Court of Claims action (0.20); E-mails with W. Dalsen regarding discovery, e-mail with L. Raiford regarding schedule, review M. Dale summary of discovery call (0.30); Analyze bondholders lien scope summary judgment motion and outline responses (2.10); Review bondholders statement of undisputed facts (0.80); Participate in call with M. Dale and team regarding summary judgment replies (1.00).	6.00	\$4,734.00

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Date	Timekeeper	Task	Description	Hours	Amount
09/16/20	William D. Dalsen	210	Call with counsel to AAFAF regarding discovery requests in claims and administrative expense proceedings (0.40); Correspondence with M. Dale regarding claims/administrative expense discovery requests (0.30).	0.70	\$552.30
09/17/20	William D. Dalsen	210	Review Bondholders' and Fiscal Agent summary judgment briefs (1.40); Call with counsel to Committees regarding summary judgment briefing (0.80).	2.20	\$1,735.80
09/17/20	Jennifer L. Roche	210	Draft outline regarding opposition to bondholders lien scope summary judgment motion.	1.50	\$1,183.50
09/17/20	Jeffrey W. Levitan	210	E-mails S. Weise regarding ultra vires issues (0.30); E-mail W. Dalsen regarding discovery (0.10); Review briefs to prepare for call with committee counsel (0.50); Participate in call with S. Weise, committee counsel regarding summary judgment briefs (0.70).	1.60	\$1,262.40
09/17/20	Ariella Muller	210	Call with W. Dalsen and S. Schaefer to discuss project analyzing discovery produced in previous ERS litigations to see if we have already produced documents responsive to discovery requested by bondholders with respect to administrative expense claims (0.70).	0.70	\$552.30
09/17/20	Steven O. Weise	210	Review BNY brief on avoiding bonds for exceeding statutory authority and conference co-counsel regarding same.	1.70	\$1,341.30
09/18/20	Joshua A. Esses	210	Draft presentation for bondholders on settlement options.	0.30	\$236.70
09/18/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding summary judgment strategy (0.30).	0.30	\$236.70
09/18/20	Jeffrey W. Levitan	210	Review bondholder recovery analysis, e-mails J. Esses regarding same.	0.50	\$394.50
09/20/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding weekly litigation team meeting.	0.10	\$78.90
09/21/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding weekly litigation team meeting (0.10); Videoconference with M. Dale and Proskauer team regarding summary judgment strategy (0.50); Review bondholders' motion for summary judgment (4.10); E-mails with J. Roche and Proskauer team regarding same (0.10); E-mails with M. Dale and Proskauer team regarding deposition errata (0.10).	4.90	\$3,866.10

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Date	Timekeeper	Task	Description	Hours	Amount
09/21/20	Ariella Muller	210	Attend ERS team meeting with M. Dale regarding status and strategy (0.60); Review discovery communications in connection with Fiscal Agent disclosures per W. Dalsen (0.50).	1.10	\$867.90
09/21/20	William D. Dalsen	210	Call with counsel to United States regarding Court of Federal Claims Case (0.40); Correspondence with M. Dale and J. Levitan regarding Court of Federal Claims case (0.20); Correspondence with counsel to Retiree Committee regarding draft opposition to ultra vires brief (0.20); Team meeting regarding ERS case status (0.50).	1.30	\$1,025.70
09/21/20	Jeffrey W. Levitan	210	E-mail J. Roche, review outline regarding lien scope summary judgment opposition (0.50); E-mails W. Dalsen regarding Court of Claims, discovery (0.20).	0.70	\$552.30
09/21/20	Margaret A. Dale	210	E-mails with J. Levitan and W. Dalsen regarding Fiscal Agent motion for summary judgment and discovery related thereto (0.20); Conference call with litigation team regarding work/analysis/strategy (0.50); Partial review of bondholders' Rule 56.1 statement in support of lien scope motion for summary judgment (1.60).	2.30	\$1,814.70
09/22/20	Margaret A. Dale	210	E-mails with W. Dalsen regarding Fiscal Agent motion for summary judgment (0.20); Analyze and provide comments to outline for opposition to bondholder lien scope summary judgment motion (1.50).	1.70	\$1,341.30
09/22/20	Steven O. Weise	210	Review tracing issues.	2.60	\$2,051.40
09/22/20	William D. Dalsen	210	Call with counsel to Retiree Committee regarding opposition to motions for summary judgment (0.90); Correspondence with J. Levitan and M. Dale regarding oppositions to motions for summary judgment (0.40).	1.30	\$1,025.70
09/22/20	Mee R. Kim	210	Review bondholders' motion for summary judgment (3.20); E-mails with M. Dale and Proskauer team regarding same (0.10); Review response outline regarding same (0.40); Review deposition errata (0.10).	3.80	\$2,998.20
09/23/20	Mee R. Kim	210	Review bondholders' motion for summary judgment (3.70); E-mails with M. Dale and Proskauer team regarding same (1.60); E-mails with Brattle team regarding same (0.20).	5.50	\$4,339.50

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Date	Timekeeper	Task	Description	Hours	Amount
09/23/20	Ariella Muller	210	Draft outline analyzing cases cited by bondholders regarding contract interpretation and distinguished from our situation (2.40); Research regarding offering statement/official statement to clarify terms in the bond resolution (1.50); Draft short memorandum analyzing relevant cases (0.50); Call with W. Dalsen and S. Schaefer to discuss discovery in administrative expenses matter (0.30).	4.70	\$3,708.30
09/23/20	William D. Dalsen	210	Correspondence with counsel to bondholders regarding Court's request to terminate delivery of hard-copy documents from bondholder service agent (0.20); Call with S. Schaefer regarding claims and administrative expense discovery (0.30); Call with A. Muller regarding summary judgment briefing (0.30).	0.80	\$631.20
09/23/20	Margaret A. Dale	210	E-mails with Proskauer attorneys related to Court inquiry concerning BMC agent for bondholders (0.20).	0.20	\$157.80
09/23/20	Jeffrey W. Levitan	210	E-mails L. Stafford regarding service issues (0.20); E-mails M. Dale, J. Roche, review R. Kim analysis regarding lien scope summary judgment (0.40).	0.60	\$473.40
09/23/20	Steven O. Weise	210	Review outline for brief on tracing issues and lien scope.	1.30	\$1,025.70
09/24/20	Steven O. Weise	210	Review outline for brief on tracing issues and lien scope.	2.20	\$1,735.80
09/24/20	Margaret A. Dale	210	Review and analyze bondholders' lien scope summary judgment motion to prepare for team meeting regarding opposition to same (0.60).	0.60	\$473.40
09/24/20	Mee R. Kim	210	E-mails with Brattle team regarding bondholders' motion for summary judgment (0.50); E-mails with M. Dale and Proskauer team regarding same (1.60); Review materials regarding same (0.80).	2.90	\$2,288.10
09/24/20	Michael R. Hackett	210	Analysis regarding motions for judgment on the pleadings (1.20).	1.20	\$946.80
09/24/20	Ariella Muller	210	E-mail with J. Roche regarding additional research in connection with bond resolution.	0.10	\$78.90

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Date	Timekeeper	Task	Description	Hours	Amount
09/25/20	Ariella Muller	210	Call with M. Dale and ERS team to discuss bondholders brief and our best counterarguments (1.10); Review arguments made in our motion for summary judgment (0.70); Review argument made by bondholders in their brief (0.50); Review arguments made in prior case (0.50); Review Court's decision on the argument in the prior case (0.70).	3.50	\$2,761.50
09/25/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding bondholders' motion for summary judgment (0.50); Videoconference with M. Dale and Proskauer team regarding same (1.10); E-mails with Brattle team regarding same (0.20); Review materials regarding same (1.80).	3.60	\$2,840.40
09/25/20	Margaret A. Dale	210	Review S. Weise and J. Levitan comments to outline of opposition to bondholder lien scope summary judgment motion (0.80); Review bondholder 56.1 statement (1.40); Conference call with J. Levitan, S. Weise, J. Roche, W. Dalsen, R. Kim and A. Muller to discuss opposition to bondholder lien scope summary judgment motion (1.10).	3.30	\$2,603.70
09/25/20	William D. Dalsen	210	Call with J. Roche and team regarding opposition to bondholders' motion for summary judgment on lien scope issues (1.10).	1.10	\$867.90
09/27/20	Mee R. Kim	210	E-mail with M. Dale and Proskauer team regarding summary judgment strategy (0.10); Draft memorandum regarding same (3.20).	3.30	\$2,603.70
09/29/20	Mee R. Kim	210	E-mails with M. Dale and Proskauer team regarding summary judgment strategy (0.30); Revise memorandum regarding same (1.30); E-mails with M. Dale and Board consultants regarding same (0.10).	1.70	\$1,341.30
09/29/20	Jeffrey W. Levitan	210	Review Pompeo letter regarding discovery (0.20); Review Act 896, team e-mails regarding lien scope (0.20).	0.40	\$315.60
09/30/20	Mee R. Kim	210	E-mails with Brattle team regarding summary judgment strategy (0.20); E-mails with M. Dale and Proskauer team regarding same (0.30); E-mail with M. Dale regarding same (0.10).	0.60	\$473.40
09/30/20	Jeffrey W. Levitan	210	E-mail J. Roche regarding lien scope.	0.20	\$157.80
09/30/20	William D. Dalsen	210	Review correspondence from J. Roche regarding opposition to summary judgment motion (0.20).	0.20	\$157.80

Analysis and Strategy	203.50	\$160,561.50
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General Administration -- 212

Date	Timekeeper	Task	Description	Hours	Amount
09/01/20	Shealeen E. Schaefer	212	Review Rule 2004 document production to identify topics and nature of materials.	1.60	\$432.00
09/01/20	Shealeen E. Schaefer	212	Update master production index to include additional information regarding productions.	0.80	\$216.00
09/02/20	Shealeen E. Schaefer	212	Continue review and analysis of case records and document productions to identify additional authorities in connection summary judgment and ancillary documents.	1.30	\$351.00
09/02/20	Lawrence T. Silvestro	212	Telephone call with A. Muller regarding assignments and preparation for summary judgment (0.70); Review revised statement of fact to identify additional caselaw and other authorities (1.20); Telephone calls and e-mails with First Circuit clerk regarding oral argument audio file (0.70).	2.60	\$702.00
09/02/20	Lela Lerner	212	Review and compile new authorities cited in ERS motion for summary judgment (lien) per L. Silvestro (1.10); Convert citations into LPRA format (0.40).	1.50	\$405.00
09/03/20	Lawrence T. Silvestro	212	Review further revised statement of fact and motion for summary judgment to identify and confirm additional case law and other authorities (2.40).	2.40	\$648.00
09/03/20	Shealeen E. Schaefer	212	Identify materials regarding motion to seal in connection with summary judgment briefing.	1.70	\$459.00
09/04/20	Shealeen E. Schaefer	212	E-mails with J. Roche regarding documents cited in statement of material undisputed facts.	0.10	\$27.00
09/04/20	Shealeen E. Schaefer	212	Review latest draft of summary judgment and ancillary filings to identify materials in support.	3.30	\$891.00
09/04/20	Lawrence T. Silvestro	212	Review revised statement of fact and motion for summary judgment to identify and confirm additional case law and other authorities (1.90).	1.90	\$513.00
09/08/20	Shealeen E. Schaefer	212	Identify and review production documents in connection with summary judgment.	1.90	\$513.00
09/08/20	Shealeen E. Schaefer	212	Update document detailing summaries of key deposition testimony and exhibits.	1.80	\$486.00

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Date	Timekeeper	Task	Description	Hours	Amount
09/08/20	Joan K. Hoffman	212	Cite-check ERS summary judgment motion.	1.30	\$351.00
09/08/20	Olaide M. Adejobi	212	Compile confidentiality designations per W. Dalsen.	1.00	\$270.00
09/08/20	Olaide M. Adejobi	212	Review bondholder depositions and identify confidentiality designations per W. Dalsen.	0.80	\$216.00
09/08/20	Lawrence T. Silvestro	212	Telephone calls and e-mails with attorneys and paralegals regarding summary judgment motion logistics (0.90); Review and revise summary judgment motion to identify additional sources (3.70).	4.60	\$1,242.00
09/09/20	Lawrence T. Silvestro	212	Review and edit case, record and statutory authorities in final draft summary judgment motion (5.20); Research motions to exceed page limits and provide example templates, per A. Muller (0.90).	6.10	\$1,647.00
09/09/20	Angelo Monforte	212	Review and edit citations to portion of draft ERS memorandum in support of motion for summary judgment per J. Roche (2.20); Conduct related research (0.40).	2.60	\$702.00
09/09/20	Olaide M. Adejobi	212	Compile bondholder deposition confidentiality designations per W. Dalsen.	1.10	\$297.00
09/09/20	Joan K. Hoffman	212	Cite-check ERS summary judgment motion.	6.30	\$1,701.00
09/09/20	Shealeen E. Schaefer	212	Identify and prepare exhibits in support of summary judgment and ancillary filings.	2.90	\$783.00
09/09/20	Shealeen E. Schaefer	212	Review draft summary judgment to verify citations and identify additional materials in support.	3.30	\$891.00
09/10/20	Shealeen E. Schaefer	212	Review and revise summary judgment including ancillary filings.	6.30	\$1,701.00
09/10/20	Shealeen E. Schaefer	212	Identify and prepare exhibits for declarations in support of summary judgment.	4.70	\$1,269.00
09/10/20	Shealeen E. Schaefer	212	Update case database to incorporate additional case records and correspondence.	0.90	\$243.00
09/10/20	Lawrence T. Silvestro	212	Review statement of fact and summary judgment to edit case, record and statutory authorities in revised final drafts (3.90); Review draft notice of motion (0.90); Finalize exhibits to conform with Court rules (1.10).	5.90	\$1,593.00
09/10/20	Joan K. Hoffman	212	Cite-check ERS summary judgment motion.	1.60	\$432.00
09/11/20	Shealeen E. Schaefer	212	Review and revise statement of material undisputed facts including verification of citations to declarations.	2.70	\$729.00

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Date	Timekeeper	Task	Description	Hours	Amount
09/11/20	Shealeen E. Schaefer	212	E-mails with J. Roche regarding revisions to summary judgment and ancillary filings.	0.40	\$108.00
09/11/20	Shealeen E. Schaefer	212	Update and organize case database to incorporate additional materials.	1.40	\$378.00
09/11/20	Shealeen E. Schaefer	212	Review latest draft of summary judgment to verify citation to statement of undisputed facts and declarations in preparation for filing.	3.30	\$891.00
09/11/20	Lawrence T. Silvestro	212	Final review of motion for summary judgment and format table of authorities (3.10); Prepare all electronic copies to conform with requirements for electronic filing and service (0.80); Confirm and final review statement of facts and supporting declaration (1.10).	5.00	\$1,350.00
09/11/20	Angelo Monforte	212	Compile as filed motion for summary judgment filings and submit courtesy copies of same to Judge Swain.	1.20	\$324.00
09/11/20	Olaide M. Adejobi	212	Compile filed motions for summary judgment per L. Silvestro and circulate to attorney team (0.80); Draft index of filings per M. Dale and J. Levitan binders (0.60).	1.40	\$378.00
09/11/20	Joan K. Hoffman	212	Draft table of authorities for ERS motion for summary judgment.	2.80	\$756.00
09/12/20	Olaide M. Adejobi	212	Compile additional summary judgment filings (0.80); Update index with new filings and circulate to wider attorney team per W. Dalsen (1.10); Prepare filings for M. Dale and J. Levitan (0.30).	2.20	\$594.00
09/14/20	Shealeen E. Schaefer	212	Identify and review authorities cites in summary judgment motions.	4.10	\$1,107.00
09/14/20	Lawrence T. Silvestro	212	Review and organize motions for summary judgment and ancillary supporting documents in internal database (1.20).	1.20	\$324.00
09/15/20	Shealeen E. Schaefer	212	Identify and review authorities cites in summary judgment motions.	4.40	\$1,188.00
09/15/20	Olaide M. Adejobi	212	Compile various motions for summary judgment per S. Weise.	0.20	\$54.00
09/16/20	Shealeen E. Schaefer	212	Review authorities cites in summary judgment motions.	0.80	\$216.00
09/16/20	Shealeen E. Schaefer	212	Review discovery in connection with claims and administrative expense motions.	0.80	\$216.00
09/17/20	Shealeen E. Schaefer	212	Review historical case records in connection with claims and administrative expense motions.	4.30	\$1,161.00
09/18/20	Shealeen E. Schaefer	212	Continue analysis of historical case records in connection with claims and administrative expense motions.	5.40	\$1,458.00

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Date	Timekeeper	Task	Description	Hours	Amount
09/19/20	Shealeen E. Schaefer	212	Continue analysis of historical case records in connection with claims and administrative expense motions.	0.50	\$135.00
09/21/20	Shealeen E. Schaefer	212	Continue analysis of written discovery and correspondence in connection with claims and administrative expense motions.	4.40	\$1,188.00
09/22/20	Shealeen E. Schaefer	212	Continue analysis of discovery and correspondence in connection with claims and administrative expense motions.	4.80	\$1,296.00
09/23/20	Shealeen E. Schaefer	212	Draft chart detailing analysis of claims and administrative expense discovery.	2.90	\$783.00
09/24/20	Shealeen E. Schaefer	212	Continue drafting workbook detailing analysis of claims and administrative expense discovery.	3.20	\$864.00
09/24/20	Shealeen E. Schaefer	212	Analyze discovery in connection with bondholders' claims and administrative expense discovery.	4.70	\$1,269.00
09/25/20	Shealeen E. Schaefer	212	Continue analysis of discovery and Court records in connection with bondholders' claims and administrative expenses.	4.90	\$1,323.00
09/25/20	Shealeen E. Schaefer	212	Continue drafting chart detailing analysis of Bondholders' claims and administrative expenses.	3.30	\$891.00
09/26/20	Shealeen E. Schaefer	212	Analyze Court docket including orders in connection with bondholders' claims and administrative expenses.	1.00	\$270.00
09/27/20	Shealeen E. Schaefer	212	Continue analysis of Court docket in connection with bondholders' claims and administrative expenses.	1.50	\$405.00
09/28/20	Shealeen E. Schaefer	212	Draft timeline detailing claims and administrative expenses motions and related discovery.	3.60	\$972.00
09/28/20	Shealeen E. Schaefer	212	Review communications history related to claims and administrative expenses.	3.10	\$837.00
09/28/20	Lawrence T. Silvestro	212	Review and organize summary judgment briefing to internal document database (1.10).	1.10	\$297.00
09/29/20	Shealeen E. Schaefer	212	Update and organize case database to incorporate additional materials.	1.40	\$378.00
09/29/20	Shealeen E. Schaefer	212	Draft chart detailing analysis of claims and administrative expense motions and discovery.	3.90	\$1,053.00
09/29/20	Shealeen E. Schaefer	212	Continue analysis of Court records in connection with bondholders' claims and administrative expenses.	1.80	\$486.00
09/29/20	Eric R. Chernus	212	Review production reload to ERS workspace and release to case team (0.40).	0.40	\$108.00
09/30/20	Lawrence T. Silvestro	212	Obtain and circulate transcripts related to first circuit appeals (0.40).	0.40	\$108.00

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Date	Timekeeper	Task	Description	Hours	Amount
09/30/20	Shealeen E. Schaefer	212	Update compilation of authorities cited in summary judgment briefing for attorney review.	4.30	\$1,161.00
General Administration				163.10	\$44,037.00

Employment and Fee Applications -- 218

Date	Timekeeper	Task	Description	Hours	Amount
09/16/20	Natasha Petrov	218	Revisions to Proskauer ninth interim fee application per E. Stevens and E. Barak (1.30); Update notice of filing of same (0.30).	1.60	\$432.00
09/17/20	Natasha Petrov	218	Revise Proskauer ninth interim fee application per additional comments from client and M. Bienenstock (0.40); Finalize exhibits in preparation for filing (0.50); Finalize notice of filing for same (0.30).	1.20	\$324.00
09/18/20	Natasha Petrov	218	Finalize for filing Proskauer ninth interim fee application.	0.60	\$162.00
Employment and Fee Applications				3.40	\$918.00

Total for Professional Services **\$395,823.30**

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Timekeeper Summary

Timekeeper	Status	Hours	Rate	Value
EHUD BARAK	PARTNER	16.60	789.00	\$13,097.40
JEFFREY W. LEVITAN	PARTNER	67.60	789.00	\$53,336.40
LARY ALAN RAPPAPORT	PARTNER	0.70	789.00	\$552.30
MARGARET A. DALE	PARTNER	39.80	789.00	\$31,402.20
MARTIN J. BIENENSTOCK	PARTNER	28.60	789.00	\$22,565.40
MICHAEL A. FIRESTEIN	PARTNER	1.70	789.00	\$1,341.30
MICHAEL R. HACKETT	PARTNER	8.60	789.00	\$6,785.40
STEVEN O. WEISE	PARTNER	97.80	789.00	\$77,164.20
TIMOTHY W. MUNGOVAN	PARTNER	0.50	789.00	\$394.50
Total for PARTNER		261.90		\$206,639.10
JENNIFER L. ROCHE	SENIOR COUNSEL	64.80	789.00	\$51,127.20
Total for SENIOR COUNSEL		64.80		\$51,127.20
ARIELLA MULLER	ASSOCIATE	27.80	789.00	\$21,934.20
JOSHUA A. ESSES	ASSOCIATE	4.30	789.00	\$3,392.70
MEE R. KIM	ASSOCIATE	51.40	789.00	\$40,554.60
WILLIAM D. DALSEN	ASSOCIATE	34.50	789.00	\$27,220.50
Total for ASSOCIATE		118.00		\$93,102.00
ANGELO MONFORTE	LEGAL ASSISTANT	3.80	270.00	\$1,026.00
JOAN K. HOFFMAN	LEGAL ASSISTANT	12.00	270.00	\$3,240.00
LAWRENCE T. SILVESTRO	LEGAL ASSISTANT	31.20	270.00	\$8,424.00
LELA LERNER	LEGAL ASSISTANT	1.50	270.00	\$405.00
NATASHA PETROV	LEGAL ASSISTANT	3.40	270.00	\$918.00
OLAIDE M. ADEJOBI	LEGAL ASSISTANT	6.70	270.00	\$1,809.00
SHEALEEN E. SCHAEFER	LEGAL ASSISTANT	107.50	270.00	\$29,025.00
Total for LEGAL ASSISTANT		166.10		\$44,847.00
ERIC R. CHERNUS	PRAC. SUPPORT	0.40	270.00	\$108.00
Total for PRAC. SUPPORT		0.40		\$108.00
Total		611.20		\$395,823.30

For Charges and Disbursements

Date	Timekeeper	Type	Description	Amount
09/09/2020	Joan K. Hoffman	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$891.00
09/09/2020	Lawrence T. Silvestro	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$792.00
09/14/2020	Shealeen E. Schaefer	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$99.00
			Total for LEXIS	\$1,782.00

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Date	Timekeeper	Type	Description	Amount
08/23/2020	Ariella Muller	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 26 Lines Printed	\$1,001.00
08/26/2020	Ariella Muller	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 15 Lines Printed	\$572.00
08/27/2020	Ariella Muller	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 24 Lines Printed	\$861.00
08/27/2020	Joshua A. Esses	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 4 Lines Printed	\$429.00
08/27/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 7 Lines Printed	\$934.00
08/27/2020	William D. Dalsen	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 3 Lines Printed	\$244.00
08/28/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 6 Lines Printed	\$143.00
08/29/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 4 Lines Printed	\$143.00
08/31/2020	Ariella Muller	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 48 Lines Printed	\$1,573.00
08/31/2020	Jennifer L. Roche	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 2 Lines Printed	\$143.00
09/09/2020	Joan K. Hoffman	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 9 Lines Printed	\$286.00
09/09/2020	Angelo Monforte	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 6 Lines Printed	\$265.00
09/09/2020	Angelo Monforte	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 34 Lines Printed	\$143.00
09/14/2020	Shealeen E. Schaefer	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 33 Lines Printed	\$286.00
09/18/2020	Shealeen E. Schaefer	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 17 Lines Printed	\$244.00
			Total for WESTLAW	\$7,267.00
Date	Timekeeper	Type	Description	Amount
08/27/2020	Martin J. Bienenstock	HIGHQ LICENSING	HIGHQ LICENSING - ERS Lien Scope - M. Rina Kim - Shealeen Schaefer - 02/04/2020 09:09:38 PM	\$185.00
09/24/2020	Martin J. Bienenstock	HIGHQ LICENSING	HIGHQ LICENSING - ERS Lien Scope - M. Rina Kim - Shealeen Schaefer - 02/04/2020 09:09:38 PM	\$185.00

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Total for HIGHQ LICENSING \$370.00

Date	Timekeeper	Type	Description	Amount
08/26/2020	Lawrence T. Silvestro	FILING AND COURT COSTS	FILING AND COURT COSTS - - VENDOR: CLERK OF U.S. COURT OF APPEALS Clerk, US Court of Appeals for the First Circuit; December 4, 2019 Oral Argument Audio File Request, Case No. 19-1699 ; CM# 33260.007 for Promesa III:ERS	\$31.00
Total for FILING AND COURT COSTS				\$31.00

Date	Timekeeper	Type	Description	Amount
07/07/2020	Martin J. Bienenstock	MESSENGER/DELIVERY	MESSENGER/DELIVERY Delivery Steve Weise 8587 SPRINGRIDGE RD NE BAINBRIDGE IS LAND WA, Tracking #: 394598206616, Shipped on 07 0720, Invoice #: 706792891	\$44.54
07/23/2020	Martin J. Bienenstock	MESSENGER/DELIVERY	MESSENGER/DELIVERY Delivery Margaret Dale 510 PHILADELPHIA BLVD SEA GIRT NJ , Tracking #: 395083583325, Shipped on 072320, I nvoice #: 708079186	\$17.90
08/07/2020	Martin J. Bienenstock	MESSENGER/DELIVERY	MESSENGER/DELIVERY Delivery Margaret Dale 510 PHILADELPHIA BLVD SEA GIRT NJ, Tracking #: 395583938636, Shipped on 080720, In voice #: 709420969	\$17.90
Total for MESSENGER/DELIVERY				\$80.34

Date	Timekeeper	Type	Description	Amount
07/09/2020	Martin J. Bienenstock	PRACTICE SUPPORT VENDORS	PRACTICE SUPPORT VENDORS - - VENDOR: LD LOWER HOLIDNGS INC KL DISCOVERY ONTRACK - INVOICE - P0100129163- DISCOVERY SERVICES-06/01/20 - 06/30/20 - Active Hosting - Relativity	\$3,104.90
08/10/2020	Martin J. Bienenstock	PRACTICE SUPPORT VENDORS	PRACTICE SUPPORT VENDORS - - VENDOR: LD LOWER HOLIDNGS INC KL DISCOVERY ONTRACK- INVOICE- P0100134108-DISCOVERY SERVICES- 07/01/20 -07/30/20 - Active Hosting - Relativity	\$3,780.00
Total for PRACTICE SUPPORT VENDORS				\$6,884.90

Charges and Disbursements Summary

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Type of Disbursements	Amount
LEXIS	1,782.00
WESTLAW	7,267.00
HIGHQ LICENSING	370.00
FILING AND COURT COSTS	31.00
MESSENGER/DELIVERY	80.34
PRACTICE SUPPORT VENDORS	6,884.90
Total Expenses	\$16,415.24
Total Amount for this Matter	\$412,238.54

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Summary of Time Billed by Task		Hours	Value
212	General Administration	1.70	\$459.00
219	Appeal	223.60	\$176,420.40
Total		225.30	\$176,879.40

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General Administration -- 212

Date	Timekeeper	Task	Description	Hours	Amount
09/25/20	Angelo Monforte	212	Andalusian: Review petition for writ of certiorari and draft response, and compile cases and statutes cited in same per J. Roberts.	1.70	\$459.00
General Administration				1.70	\$459.00

Appeal -- 219

Date	Timekeeper	Task	Description	Hours	Amount
09/01/20	John E. Roberts	219	Andalusian: Call with W. Dalsen to discuss factual issues relevant to certiorari opposition (0.30); Calls with A. Deming to discuss issues in certiorari opposition (0.30); Draft certiorari opposition (7.40).	8.00	\$6,312.00
09/01/20	Adam L. Deming	219	Andalusian: Confer with J. Roberts regarding drafting duties for certiorari opposition.	0.10	\$78.90
09/01/20	Adam L. Deming	219	Andalusian: Call with J. Roberts regarding PayGo payments and effect on vehicle arguments (0.20); Conduct research regarding vehicle issues arising from various adversary cases pertaining to lien scope and bond issuance for ERS bondholders (2.20); Begin drafting vehicle section (0.80).	3.20	\$2,524.80
09/01/20	Adam L. Deming	219	Andalusian: Confer with W. Dalsen regarding various lines of attack on security interests and remedies creating potential vehicle issues.	0.30	\$236.70
09/01/20	William D. Dalsen	219	Andalusian: Call with J. Roberts regarding ERS response to bondholders' certiorari petition on 552 issues (0.30); Correspondence with S. Schaefer and L. Silvestro regarding ERS response to bondholders' certiorari petition on 552 issues (0.20); Correspondence with J. Roberts regarding ERS response to bondholders' certiorari petition on 552 issues (0.20); Call with A. Deming regarding bondholder certiorari petition (0.50).	1.20	\$946.80

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Date	Timekeeper	Task	Description	Hours	Amount
09/02/20	Adam L. Deming	219	Andalusian: Review lien scope and ultra vires complaints (1.10); Compose sections of poor vehicle opposition pertaining to underlying adversary proceedings (1.20); Draft portion of vehicle section regarding preserved arguments unreached in decision below (1.00); Review and revise draft for J. Roberts (0.90).	4.20	\$3,313.80
09/02/20	John E. Roberts	219	Andalusian: Draft opposition to petition for certiorari.	4.00	\$3,156.00
09/03/20	John E. Roberts	219	Andalusian: Draft certiorari opposition.	4.90	\$3,866.10
09/03/20	Adam L. Deming	219	Andalusian: Locate ERS bond offering statement and related documents in adversary proceeding dockets for citation purposes in opposition (0.50); Cite-check draft circulated by J. Roberts and incorporate internal citations to adversary action dockets where necessary (1.10).	1.60	\$1,262.40
09/04/20	Adam L. Deming	219	Andalusian: Conduct additional research regarding number and status of various actions concerning scope of security interests in pledged property purportedly held by ERS bondholders (1.90); Incorporate additional citations and amend draft fact section as necessary to reflect various actions and other edits (1.30).	3.20	\$2,524.80
09/04/20	John E. Roberts	219	Andalusian: Draft certiorari opposition.	5.10	\$4,023.90
09/08/20	John E. Roberts	219	Andalusian: Draft certiorari opposition.	7.00	\$5,523.00
09/08/20	Adam L. Deming	219	Andalusian: Draft section distinguishing cases cited in petition regarding effects of case on various types of secured transactions.	1.90	\$1,499.10
09/08/20	Adam L. Deming	219	Andalusian: Conduct research on commentary regarding Andalusian decision and secured lending generally.	1.80	\$1,420.20
09/08/20	Adam L. Deming	219	Andalusian: Conduct research on market reactions (and lack thereof) to issuance of Andalusian decision within municipal bond market.	1.40	\$1,104.60
09/08/20	Adam L. Deming	219	Andalusian: Conduct research on commentary regarding Andalusian decision and secured lending in specific property contexts, including research on each case cited in petition on various types of secured transactions.	2.20	\$1,735.80
09/08/20	Adam L. Deming	219	Andalusian: Draft section regarding lack of effect of decision on secured transactions and debt financing generally.	1.70	\$1,341.30

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Date	Timekeeper	Task	Description	Hours	Amount
09/09/20	Adam L. Deming	219	Andalusian: Review and revise exceptional importance section of certiorari opposition.	0.60	\$473.40
09/09/20	Adam L. Deming	219	Andalusian: Conduct research on market reactions (and lack thereof) to issuance of Andalusian decision within municipal bond market.	0.90	\$710.10
09/09/20	Adam L. Deming	219	Andalusian: Confer with J. Roberts regarding follow-up tasks after submission of draft exceptional importance section.	0.10	\$78.90
09/09/20	Adam L. Deming	219	Andalusian: Draft section on market non-reaction and lack of impact to municipal bond market from First Circuit Andalusian decision, to complete draft exceptional importance section of certiorari opposition.	1.60	\$1,262.40
09/09/20	John E. Roberts	219	Andalusian: Draft certiorari opposition.	8.50	\$6,706.50
09/10/20	John E. Roberts	219	Andalusian: Draft and revise cert opposition.	9.20	\$7,258.80
09/10/20	Adam L. Deming	219	Andalusian: Review, cite-check, and revise draft introductory and first sections of draft opposition.	1.90	\$1,499.10
09/11/20	Adam L. Deming	219	Andalusian: Revise J. Roberts' circulated first draft of certiorari opposition, sections II through V (2.90); Conduct final overall review before circulating to J. Roberts (0.90).	3.80	\$2,998.20
09/11/20	John E. Roberts	219	Andalusian: Call with A. Deming to discuss certiorari opposition (0.10); Revise certiorari opposition (2.00).	2.10	\$1,656.90
09/12/20	Jeffrey W. Levitan	219	Andalusian: Review draft certiorari opposition (1.30); E-mails with J. Esses regarding same (0.10).	1.40	\$1,104.60
09/12/20	Steven O. Weise	219	Andalusian: Review draft response to bondholder petition for certiorari.	0.80	\$631.20
09/13/20	Mark Harris	219	Andalusian: Review and revise opposition to certiorari petition.	2.50	\$1,972.50
09/14/20	Steven O. Weise	219	Andalusian: Review draft response to bondholder petition for certiorari.	1.80	\$1,420.20
09/14/20	Joshua A. Esses	219	Andalusian: Review opposition to certiorari petition.	0.40	\$315.60
09/15/20	Adam L. Deming	219	Andalusian: Review J. Esses comments to draft opposition.	0.10	\$78.90
09/15/20	Joshua A. Esses	219	Andalusian: Review opposition to certiorari petition on section 552 matter (3.00).	3.00	\$2,367.00
09/15/20	Mark Harris	219	Andalusian: Telephone conference with J. Roberts regarding opposition (0.30); Began reading background materials (2.70).	3.00	\$2,367.00

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Date	Timekeeper	Task	Description	Hours	Amount
09/15/20	John E. Roberts	219	Andalusian: Call with M. Harris to discuss certiorari opposition (0.30); Review comments to draft certiorari opposition from J. Esses (0.20).	0.50	\$394.50
09/15/20	Jeffrey W. Levitan	219	Andalusian: Review comments to certiorari opposition (0.30).	0.30	\$236.70
09/15/20	Steven O. Weise	219	Andalusian: Review draft response to bondholder petition for certiorari.	1.70	\$1,341.30
09/16/20	John E. Roberts	219	Andalusian: Calls with M. Harris to discuss issues in certiorari opposition (1.50); Research and analyze arguments concerning applicable law in 552 cases (2.50).	4.00	\$3,156.00
09/16/20	Adam L. Deming	219	Andalusian: Conduct additional research regarding property rights under Puerto Rico law.	0.80	\$631.20
09/16/20	Mark Harris	219	Andalusian: Review and revise certiorari opposition in Andalusian.	7.30	\$5,759.70
09/17/20	Mark Harris	219	Andalusian: Review certiorari opposition arguments (2.20); Telephone conference with J. Roberts regarding same (0.80).	3.00	\$2,367.00
09/17/20	John E. Roberts	219	Andalusian: Call with M. Harris to discuss issues in certiorari opposition (0.80); Revise certiorari opposition per comments of M. Harris (3.50).	4.30	\$3,392.70
09/18/20	John E. Roberts	219	Andalusian: Call with M. Harris to discuss arguments in certiorari opposition (0.60); Revise certiorari opposition per comments of M. Harris (3.50).	4.10	\$3,234.90
09/18/20	Adam L. Deming	219	Andalusian: Conduct additional research on status of expectancies under Puerto Rico law (0.90); Draft memorandum detailing findings (0.90); E-mails to J. Roberts and M. Harris regarding same (0.10).	1.90	\$1,499.10
09/18/20	Mark Harris	219	Andalusian: Telephone conference with J. Roberts regarding revision to Point I of certiorari opposition (0.60); Review Circuit Court cases regarding same (1.90).	2.50	\$1,972.50
09/18/20	Steven O. Weise	219	Andalusian: Review draft response to bondholder petition for certiorari.	2.30	\$1,814.70
09/20/20	Steven O. Weise	219	Andalusian: Review draft response to bondholder petition for certiorari.	5.70	\$4,497.30
09/20/20	John E. Roberts	219	Andalusian: Revise Andalusian certiorari opposition.	3.20	\$2,524.80
09/21/20	Steven O. Weise	219	Andalusian: Review draft response to bondholder petition for certiorari.	1.60	\$1,262.40
09/21/20	Jeffrey W. Levitan	219	Andalusian: Edit certiorari opposition (2.80); E-mails J. Roberts, S. Weise regarding revisions to certiorari opposition (0.50).	3.30	\$2,603.70

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Date	Timekeeper	Task	Description	Hours	Amount
09/21/20	John E. Roberts	219	Andalusian: Revise certiorari opposition per comments of S. Weise and J. Levitan.	3.10	\$2,445.90
09/21/20	John E. Roberts	219	Andalusian: Revise appellate brief.	3.90	\$3,077.10
09/21/20	Adam L. Deming	219	Andalusian: Review edits to certiorari opposition from J. Levitan and S. Weiss, as well as response to edits from J. Roberts.	0.30	\$236.70
09/21/20	Mark Harris	219	Andalusian: Continued reviewing and editing certiorari opposition.	3.00	\$2,367.00
09/22/20	Mark Harris	219	Andalusian: Review and revise Andalusian certiorari opposition (4.20); Conference with J. Roberts regarding same (0.30); Call with J. Roberts, S. Weise, and J. Levitan regarding same (0.80).	5.30	\$4,181.70
09/22/20	Margaret A. Dale	219	Andalusian: Review and revise opposition to petition for certiorari related to section 552 decision (1.80).	1.80	\$1,420.20
09/22/20	Jeffrey W. Levitan	219	Andalusian: E-mail with J. Esses regarding certiorari opposition (0.10); Review issues list, and response, compare to draft (0.50); Participate in call with J. Roberts and team regarding certiorari opposition (0.80).	1.40	\$1,104.60
09/22/20	John E. Roberts	219	Andalusian: Call with M. Harris to discuss issues in certiorari opposition (0.30); Call with S. Weise, M. Harris, and J. Levitan to discuss UCC issues in certiorari opposition (0.80); Analyze Cadle decision to determine response to argument in petition concerning whether proceeds must be "fixed and calculable" (0.60).	1.70	\$1,341.30
09/22/20	Steven O. Weise	219	Andalusian: Review draft response to bondholder petition for certiorari (1.40); Review of law regarding same (0.60); Conference with J. Roberts and team regarding same (0.80).	2.80	\$2,209.20
09/22/20	William D. Dalsen	219	Andalusian: Review draft opposition to petition for certiorari on Section 552 issues (0.70).	0.70	\$552.30
09/23/20	Mark Harris	219	Andalusian: Revise draft opposition (7.20); Telephone conference with J. Roberts regarding same (0.80).	8.00	\$6,312.00
09/23/20	Jeffrey W. Levitan	219	Andalusian: Review additional comments to certiorari opposition.	0.40	\$315.60
09/23/20	John E. Roberts	219	Andalusian: Call with M. Harris to discuss certiorari opposition (0.80); Revise certiorari opposition (1.30).	2.10	\$1,656.90
09/24/20	John E. Roberts	219	Andalusian: Call with M. Harris to discuss certiorari opposition.	0.20	\$157.80
09/24/20	Mark Harris	219	Andalusian: Revise draft certiorari opposition.	4.00	\$3,156.00

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Date	Timekeeper	Task	Description	Hours	Amount
09/25/20	Mark Harris	219	Andalusian: Revise draft certiorari opposition (3.30); Calls with J. Roberts regarding same (0.20).	3.50	\$2,761.50
09/25/20	Adam L. Deming	219	Andalusian: Revise latest version of opposition brief.	2.00	\$1,578.00
09/25/20	Adam L. Deming	219	Andalusian: Conduct research and locate support for certiorari opposition discussion of the Uniform Commercial Code.	0.70	\$552.30
09/25/20	John E. Roberts	219	Andalusian: Revise certiorari opposition (3.30); Calls with M. Harris to discuss certiorari opposition (0.20).	3.50	\$2,761.50
09/26/20	John E. Roberts	219	Andalusian: Revise certiorari opposition per comments of S. Weise, J. Levitan, and W. Dalsen.	1.50	\$1,183.50
09/26/20	Jeffrey W. Levitan	219	Andalusian: Edit certiorari. opposition (1.70); E-mails with J. Roberts regarding revisions to opposition (0.20); Review team e-mails and comments regarding opposition (0.50).	2.40	\$1,893.60
09/26/20	William D. Dalsen	219	Andalusian: Review draft opposition to certiorari petition seeking review of First Circuit decision on Section 552 (1.00).	1.00	\$789.00
09/26/20	Steven O. Weise	219	Andalusian: Review and revise draft response to bondholder petition for certiorari.	2.60	\$2,051.40
09/26/20	Jennifer L. Roche	219	Andalusian: Review opposition to certiorari petition on Section 552 issue and comments thereto (0.50); E-mails with J. Roberts, W. Dalsen and S. Weise regarding same (0.20).	0.70	\$552.30
09/27/20	Steven O. Weise	219	Andalusian: Review and revise draft response to bondholder petition for certiorari.	0.80	\$631.20
09/27/20	Mark Harris	219	Andalusian: Review and revise certiorari opposition.	0.50	\$394.50
09/27/20	Martin J. Bienenstock	219	Andalusian: Revise and draft portions of reply to ERS bondholders' cert petition.	5.70	\$4,497.30
09/29/20	Jeffrey W. Levitan	219	Andalusian: Review final draft of certiorari opposition (0.90); E-mails with M. Harris, S. Weise regarding certiorari opposition (0.50); Review outline of certiorari opposition (0.40).	1.80	\$1,420.20
09/29/20	Martin J. Bienenstock	219	Andalusian: Research and draft portions of response to ERS bondholders' certiorari petition.	7.60	\$5,996.40
09/29/20	Steven O. Weise	219	Andalusian: Review O'Melveny comments on responding to bondholder petition for certiorari.	0.50	\$394.50
09/30/20	Martin J. Bienenstock	219	Andalusian: Research, draft portions of, and edit of response to ERS bondholders' certiorari petition.	8.30	\$6,548.70

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Date	Timekeeper	Task	Description	Hours	Amount
09/30/20	Steven O. Weise	219	Andalusian: Review and revise draft response to bondholder petition for certiorari.	1.80	\$1,420.20
Appeal				223.60	\$176,420.40
Total for Professional Services					\$176,879.40

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Timekeeper Summary

Timekeeper	Status	Hours	Rate	Value
JEFFREY W. LEVITAN	PARTNER	11.00	789.00	\$8,679.00
JOHN E. ROBERTS	PARTNER	80.90	789.00	\$63,830.10
MARGARET A. DALE	PARTNER	1.80	789.00	\$1,420.20
MARK HARRIS	PARTNER	42.60	789.00	\$33,611.40
MARTIN J. BIENENSTOCK	PARTNER	21.60	789.00	\$17,042.40
STEVEN O. WEISE	PARTNER	22.40	789.00	\$17,673.60
Total for PARTNER		180.30		\$142,256.70
JENNIFER L. ROCHE	SENIOR COUNSEL	0.70	789.00	\$552.30
Total for SENIOR COUNSEL		0.70		\$552.30
ADAM L. DEMING	ASSOCIATE	36.30	789.00	\$28,640.70
JOSHUA A. ESSES	ASSOCIATE	3.40	789.00	\$2,682.60
WILLIAM D. DALSEN	ASSOCIATE	2.90	789.00	\$2,288.10
Total for ASSOCIATE		42.60		\$33,611.40
ANGELO MONFORTE	LEGAL ASSISTANT	1.70	270.00	\$459.00
Total for LEGAL ASSISTANT		1.70		\$459.00
Total		225.30		\$176,879.40

For Charges and Disbursements

Date	Timekeeper	Type	Description	Amount
09/08/2020	Adam L. Deming	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$582.00
09/16/2020	Adam L. Deming	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$152.00
09/16/2020	John E. Roberts	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$95.00
09/18/2020	Adam L. Deming	LEXIS	LEXIS Connect and Comm Time - 0:00:00 Searches - 0 Shepards and Autocite - 0 Lexsees and Lexstat - 0	\$198.00
			Total for LEXIS	\$1,027.00

Date	Timekeeper	Type	Description	Amount
09/01/2020	John E. Roberts	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 44 Lines Printed	\$572.00
09/02/2020	John E. Roberts	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 7 Lines Printed	\$143.00
09/03/2020	John E. Roberts	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 19 Lines Printed	\$1,403.00

33260 FOMB

Invoice 190161935

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MEMBER

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Date	Timekeeper	Type	Description	Amount
09/08/2020	Adam L. Deming	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 2 Lines Printed	\$265.00
09/09/2020	Adam L. Deming	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 4 Lines Printed	\$122.00
09/10/2020	John E. Roberts	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 7 Lines Printed	\$286.00
09/16/2020	John E. Roberts	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 9 Lines Printed	\$530.00
09/17/2020	John E. Roberts	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 18 Lines Printed	\$1,001.00
09/18/2020	Mark Harris	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 5 Lines Printed	\$54.00
09/18/2020	John E. Roberts	WESTLAW	WESTLAW Connect and Comm Time - 0:00:00 WestChk and Other Trans - 2 Lines Printed	\$143.00
			Total for WESTLAW	\$4,519.00

Date	Timekeeper	Type	Description	Amount
08/31/2020	Lawrence T. Silvestro	FILING AND COURT COSTS	FILING AND COURT COSTS - - VENDOR: CLERK OF U.S. COURT OF APPEALS Clerk, US Court of Appeals for the First Circuit; March 3, 2020 Oral Argument Audio File Request, Case: Andalusian Global Designated v. FOMB, et al., No. 20-1065	\$31.00
			Total for FILING AND COURT COSTS	\$31.00

Charges and Disbursements Summary

Type of Disbursements	Amount
LEXIS	1,027.00
WESTLAW	4,519.00
FILING AND COURT COSTS	31.00
Total Expenses	\$5,577.00
Total Amount for this Matter	\$182,456.40